

 An official website of the United States government



[HHS](#) > [HIPAA Home](#) > [For Professionals](#) > [HIPAA Compliance and Enforcement](#)

Navigate to:



T+    

Joint Notice of Violation to Columbia University

May 22, 2025

Felice B. Rosan
General Counsel
Columbia University
412 Low Memorial Library, MC 4308
535 West 116th Street
New York, New York 10027
Phone: (212) 854-0778
fbr@gc.columbia.edu

Re: Joint Notice of Violation (DO-25-607300-RV-CRR-Rac (HHS), 02-25-6901 Directed Investigation (ED), Columbia University)

Dear Counsel:

Pursuant to the authority delegated by the Secretary of the United States Department of Health and Human Services (HHS) to the Office for Civil Rights (HHS OCR) and by the authority delegated to the Secretary of the United States Department of Education (ED) to the Office for Civil Rights (ED OCR), we write to inform you that we are jointly issuing a Notice of Violation under Title VI of the Civil Rights Act of 1964 (Title VI)¹ against Columbia University based upon the events documented below in the Findings of Fact.

I. Legal Standard

Title VI provides that “[n]o person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance” (FFA).² A recipient of FFA may not, based on race, color, or national origin, deny services or other benefits; provide a different service or other benefit, or provide services or benefits in a different manner from those provided to others under the program; or segregate or separately treat individuals in any matter related to the receipt of any service or other benefit under any covered program.³

1. Denial of “educational opportunity or benefit”

It is well established that “antisemitic harassment can amount to discrimination on the basis of race or national origin,” particularly when such harassment is based on actual or perceived Israeli identity or on actual or perceived ancestry. *T.E. v. Pine Bush Cent. Sch. Dist.*, 58 F. Supp. 3d 332, 354 (S.D.N.Y. 2014). See *Kestenbaum v. President & Fellows of Harvard Coll.*, No. CV 24- 10092-RGS, 2024 WL 3658793, at *5 (D. Mass. Aug. 6, 2024); *Louis D. Brandeis Ctr. for Hum. Rts. Under L. v. President & Fellows of Harvard Coll.*, No. CV 24-11354-RGS, 2024 WL 4681802, at *4 (D. Mass. Nov. 5, 2024); *StandWithUs Ctr. for Legal Just. v. Massachusetts Inst. of Tech.*, No. CV 24-10577-RGS, 2024 WL 3596916, at *4 (D. Mass. July 30, 2024).

Harassment that is severe or pervasive and motivated (at least in part) by race, color, or national origin, can give rise to a hostile environment claim under Title VI. See *Hayut v. State Univ. of N.Y.*, 352 F.3d 733, 748 (2d Cir. 2003) (applying harassment framework to Title IX case); *Vengalattore v. Cornell Univ.*, 36 F.4th 87, 103 (2d Cir. 2022) (“[C]ases brought under Title IX are generally to be analyzed in the same way as cases under Title VI.”). Thus, student-on-student harassment violates Title VI where it is so severe or pervasive that it “effectively bars the victim’s access to an educational opportunity or benefit.” *Davis Next Friend LaShonda D. v. Monroe Cnty. Bd. of Educ.*, 526 U.S. 629, 633 (1999).

A discrimination claim under Title VI requires harassment that “so undermines and detracts from the victims’ educational experience, that the victim-students are effectively denied equal access to an institution’s resources and opportunities.” *Id.* at 651. Indeed, a single event, if sufficiently egregious, can give rise to a hostile environment claim. See *Cadet v. All. Nursing Staffing of New York, Inc.*, 632 F. Supp. 3d 202, 229 (S.D.N.Y. 2022) (“Although hostile work environment claims ordinarily rely on a constellation of events, a single instance of conduct may constitute ‘harassment that is extraordinarily severe’ such that it establishes a hostile work environment.”).

Harassment and discrimination that deny students “educational opportunity or benefit” may take the form of a literal, physical deprivation, such as when a victim is hospitalized due to injuries, but it may also include psychological deprivation of a benefit, as demonstrated by academic decline or developing behavioral or anxiety disorders. See *Roe ex rel. Callahan v. Gustine Unified Sch. Dist.*, 678 F. Supp. 2d 1008, 1028 (E.D. Cal. 2009) (listing examples of deprivation). A university can be held liable for deliberate indifference when it fails to provide “[e]ducational benefits includ[ing] an academic environment free from [discriminatory] hostility.” *Zeno v. Pine Plains Cent. Sch. Distr.*, 702 F.3d 655, 666 (2d Cir. 2012). Indeed, “harassment that discouraged [Jewish students] from more active involvement in campus activities or which simply created a disparately hostile educational environment relative to [their] peers is properly construed as depriving [Jewish students] of the benefits and educational opportunities available at [their institution].” *Gartenberg et al. v. Cooper Union for the Advancement of Sci. & Art.*, ---F. Supp. 3d , 2025 WL 401109, at *20 (S.D.N.Y. Feb. 5, 2025) (quoting *Hayut*, 352 F.3d at 750).

2. Deliberate indifference

“[I]n certain circumstances, courts view the deliberate indifference of third parties to discrimination as a violation of Title VI by the recipient.” *T.E.*, 58 F. Supp. 3d at 356 (citing *Davis*, 526 U.S. at 643–44) (holding that a board of education could be liable for student-on-student harassment where the board acted with deliberate indifference). A school may be held civilly liable for its deliberate indifference to student-on-student harassment under Title VI if the plaintiff establishes: “(1) substantial control, (2) severe and discriminatory harassment, (3) actual knowledge, and (4) deliberate indifference.” *Zeno*, 702 F.3d at 665. Under the deliberate indifference standard, an institution is liable only “when its response (or lack thereof) to known instances of student-on-student harassment was clearly unreasonable in light of the known circumstances, . . . when remedial action only follows after a lengthy and unjustified delay, or if it offers no response at all.” *Gartenberg*, 2025 WL 401109, at *12, 17 (citations omitted). Notably, “‘the mere act of launching an investigation’—let alone the mere act of *promising* to launch an investigation—‘without any further follow-through’ cannot defeat a deliberate indifference claim.” *Id.*, at *19 (quoting *The Louis D. Brandeis Ctr. for Hum. Rights Under L. v. President & Fellows of Harvard Coll.*, No. 24-cv-11354, 2024 WL 4681802, at *5 (D. Mass. Nov. 5, 2024)).

II. Funding Jurisdiction

Recipients of FFA must comply with the nondiscrimination requirements of Title VI.⁴ Columbia University, including the Columbia University Irving Medical Center (CUIMC), is a recipient of FFA from HHS. As of March 6, 2025, from fiscal years 2023 to 2025, HHS has issued approximately \$1.73 billion in grants to The Trustees of Columbia University in the City of New York.⁵ Over that period, the National Institutes of Health issued 2,323 awards for approximately \$1.36 billion to Columbia University Health Sciences.⁶ In addition, the University is a recipient of FFA from ED, which includes substantial grants to the University.⁷

III. Factual Findings

The following factual findings are based on witness interviews conducted by HHS; review of Columbia University’s policies, procedures, institutional statements, and complaints received by or against the University; publicly available accounts such as news reports and Congressional task force findings; and Columbia University’s internal Task Force findings and reports. ED OCR review of documents provided by the University includes review of conduct reports, email correspondence, and investigative reports. This section sets forth the background, allegations, and facts relevant to our investigation.

1. Columbia University is an institution of higher learning in New York, New York, comprised of 21 schools, including the CUIMC. In academic year 2024, the University had an enrollment of approximately 36,000 students.⁸
2. On October 11, 2023, an Israeli student at Columbia University was assaulted by a non-affiliated former student with a weapon in front of Butler Library.⁹ University Public Safety called the New York Police Department (NYPD), who arrested the former student.
3. On October 11, 2023, Columbia University announced that access to the Morningside campus would only be open to Columbia ID (CUID) holders in anticipation of planned protests set for October 12, 2023.¹⁰
4. On October 24, 2023, Columbia University added a new section to University Event Policy <<https://universitypolicies.columbia.edu/content/university-event-policy>> webpage emphasizing the power to regulate the “time, place, and manner of certain forms of public expression.”
5. On October 24, 2023, Columbia University updated its Student Group Event Policy and <<https://universitypolicies.columbia.edu/content/student-group-event-policy-and-procedure>> Procedures <<https://universitypolicies.columbia.edu/content/student-group-event-policy-and-procedure>> to include a policy that grants the University “sole discretion” to determine sanctions on student organizations and their members.

6. On October 27, 2023, a swastika was found drawn on the bathroom wall on the fourth floor of the International Affairs building. Columbia University notified the New York Police Department.¹¹
7. On November 1, 2023, then-Columbia University President Minouche Shafik, Barnard College President Laura Rosenbury, and Teachers College President Thomas Bailey announced the formation of a Task Force on Antisemitism.¹²
8. On November 2, 2023, the Columbia Spectator published an article titled, "'I am a target,' Dozens of Jewish Students Report Feeling Unsafe on Campus." Of the over 50 students interviewed, 34 reported feeling unsafe on campus since October 7, 2023; 13 personally experienced incidents where they felt attacked or harassed, either in-person or online; 10 reported avoiding or fully staying off campus at some point since Oct. 7, 2023; 12 said they tried to hide or veil their Jewish identity when walking around campus; and 17 said they have been negatively affected or offended by Columbia-affiliated online spaces.¹³
9. On November 9, 2023, Keren Yarhi-Milo, Dean of the Columbia School of International and Public Affairs, announced the formation of a School of International and Public Affairs (SIPA) Anti-Hate Task Force.¹⁴
10. On November 10, 2023, Gerald Rosberg, the Senior Executive Vice President of the University and Chair, Special Committee on Campus Safety, announced the suspension of Students for Justice in Palestine (SJP) and Jewish Voice for Peace (JVP) after the groups "repeatedly violated University policies related to holding campus events, culminating in an unauthorized event Thursday afternoon that proceeded despite warnings and included threatening rhetoric and intimidation."¹⁵
11. An employee from Columbia University's cleaning staff filed a complaint, which HHS OCR reviewed, stating that, "[i]n or around November 2023, individuals began to regularly leave obscene and racially charged graffiti, including graffiti of swastikas, on the blackboards in classrooms in Hamilton Hall. [The employee] saw swastikas on the chalkboards more times than he can recall. But no matter how many times [he] removed the swastikas, individuals kept replacing them with more. [He] believes that Columbia had the ability to take action against the repeated acts of vandalism within Hamilton Hall. Columbia could have posted additional campus security officers inside Hamilton Hall to deter acts of vandalism. Columbia also had the ability to investigate and potentially identify the vandals. For example, in order to enter Hamilton Hall, individuals must swipe in with an electronic ID card. This process creates an electronic record of who is in the building at any given time. Additionally, security cameras positioned throughout Hamilton Hall capture footage of people within the building. [He] has no reason to believe that Columbia investigated any of the incidents he reported. He was never interviewed by campus security, nor was he advised of any follow-up to his complaints. Instead of taking reasonable steps to prevent or investigate the hateful messages left on the blackboards of Hamilton Hall, Columbia instructed [the employee] and his colleagues to erase them. Night after night, [he] was confronted with swastikas and obscenities in the classrooms he cleaned. They were so offensive, and Columbia's inaction was so frustrating, that one of [the employee's] colleagues eventually began throwing away chalk that had been left in the classrooms so vandals would not have anything to write with." These allegations were corroborated by a second complaint we reviewed from another Columbia University employee on their cleaning staff.
12. According to a lawsuit filed by a group of students, on November 28, 2023, a student met with School of Nursing Dean of Student Affairs Judy Wolfe to express his concerns with the campus environment and was referred to the bias reporting procedure.¹⁶ The nondiscrimination policy in effect in the fall of 2023 provided the follow reportable bases for discrimination: "Columbia University prohibits discrimination and harassment, including sexual harassment, on the basis of age, alienage or citizenship status; arrest or conviction record; caregiver status; caste; color; credit history; creed; disability; familial status; gender (sex); gender identity; genetic predisposition or carrier status; lactation accommodation; marital status; national origin; pregnancy; race; religion; salary history; sexual or reproductive health decisions; sexual orientation; status as a victim of domestic violence, stalking, or sex offenses; unemployment status; veteran or active military status; or any other protected characteristic as established by law." CU_HHSOCR_000000039.
13. On November 30, 2023, protestors from the Columbia University Apartheid Divest (CUAD) formed a "hallway of shame" on the steps leading to the Low Library during a SIPA event titled, "The War in Gaza: Constructive Campus Conversations," and featured Columbia President Shafik and SIPA Dean Keren Yarhi-Milo.¹⁷ Current Columbia University Interim President, Claire Shipman, was the moderator of the discussion.¹⁸ According to reports, "[i]n the minutes leading up to the start of the panel discussion, Public Safety officers blocked the main entrance to Low Library. In response, protestors marched around the building. Attendees of the event were asked to enter through a side entrance to the building. The protest soon shifted to face this entrance. One demonstrator stood at the entrance, holding a sign that read 'Ivy League Funds Genocide.'"¹⁹ A student alleged that Columbia University emailed a Jewish student and others that they should use a side door, which was later blocked by protestors.²⁰

14. On December 7, 2023, Columbia Social Workers 4 Palestine organized a teach-in and discussion titled, “Significance of the October 7th Palestinian Counteroffensive,” in the lobby of the Social Work Building despite the event being cancelled by the School of Social Work administration.²¹ According to reports, instead, “Moirá Curtain, the School of Social Work associate dean of student affairs and dean of students, sent an email on [December 6, 2023] notifying students of the option to attend Wednesday classes on Zoom, and that all class would be set up in a hybrid format.”²²
15. On December 7, 2023, Columbia University updated its Event Policy and Campus Resources FAQ page to make explicit that calls for genocide against Jews violate the University’s rules. “Calls for genocide against the Jewish community or any other group are abhorrent, inconsistent with our values and against our rules,” the webpage reads. “Incitement to violence against members of our community will not be tolerated.”²³
16. On December 13, 2023, Columbia University issued an announcement, “University Announces Members of the Task Force on Antisemitism.”²⁴
17. On December 20, 2023, President Shafik announced that Columbia University will be “collaborating with the University Senate, student leaders, faculty, and other members of the community on a review of University event policies and the Rules of Conduct to which those policies relate.”²⁵
18. On January 31, 2024, the Student Governing Board voted to derecognize LionLez based upon the determination that LionLez violated University non-discrimination policy due to “various group communications expressing antisemitic sentiments and a lack of condemnation for these communications.”²⁶
19. On February 2, 2024, the Foundation for Individual Rights and Expression (FIRE), on behalf a group called Law Students Against Anti-Semitism (LSAA), sent a letter of concern to the Columbia Law School Student Senate, stating, “The Senate apparently made the decision [to derecognize LionLez] after raising concerns about LSAA’s desire to adopt the International Holocaust Remembrance Alliance’s working definition of antisemitism, which student senators said improperly ‘conflated antisemitism with anti-Zionism.’ The Senate cannot condition group recognition on such viewpoint-based criteria because Columbia promises its students robust expressive rights coextensive with—if not more expansive than—the First Amendment.”²⁷
20. On February 12, 2024, the US House of Representatives Committee on Education and the Workforce issued a letter regarding Columbia University’s failure to protect Jewish students from antisemitism on campus.²⁸
21. On February 19, 2024, the Columbia Spectator reported that Columbia University released an interim event policy establishing “Demonstration Areas” and “Regular Demonstration Times” while also altering the disciplinary channel for individual students accused of violating the new policy. The demonstration policy reduced the protest approval window from 15 business days to 2 business days and created designated times and “prominent and central” spaces for protests, including on South Lawns or at the Sundial, from 12 p.m. to 6 p.m. on weekdays while classes are in session. Student groups and their individual members could not advertise demonstrations before they were approved.²⁹
22. On February 29, 2024, Eden Yadegar—a Columbia University student—testified before the United States House of Representatives Committee on Education and the Workforce “Roundtable with Jewish Students Impacted by Antisemitism.” She stated, “At Columbia University, the Jewish community is alone. We are ostracized, mocked, harassed, assaulted, and scapegoated, simply because of our identities. Students have removed their kippot and Jewish star necklaces for fear of becoming a target on campus. We cautiously map the routes we take to class to avoid being yelled at, spit on, accused of committing genocide, or threatened by calls for genocide.”³⁰
23. On February 29, 2024, students engaged in an unauthorized protest at Jerome Greene Hall, which is part of the law school. Approximately 30-40 students, including some with masks, held the protest at a third-floor café, eventually moving to the lobby. The protest lasted close to 30 minutes. Witnesses reported that the protest was purposefully held on an Admitted Students Day. One report stated that protestors were handing out flyers to admitted students and “harassing” those that rejected the flyers. By March 1, 2024, at least some of the participants in the protest received a “Demonstration Policy Warning” from the University. Ultimately, the University identified 35 students who participated in the protest.
24. On March 4, 2024, the Columbia Task Force on Antisemitism released its first report, *Columbia University’s Rules on Demonstrations* (Report #1). This report stated that Columbia failed to effectively enforce its rules regarding protests. It found: “Across Columbia University, there also have been repeated violations of the rules on protests.... Protesters have disrupted classes and events, taken over spaces in academic buildings, held unauthorized demonstrations, and used ugly language to berate individuals who were filming these protests or just walking by. There also have been reports of physical harm to students, including Columbia affiliates who were protesting against Hamas and Columbia affiliates who were protesting against Israel.”³¹

25. Despite the ongoing rule violations, Report #1 noted: “The University generally has not tried to stop violations as they have occurred, and instead has focused on imposing discipline after the fact. The priority during protests has been to avoid violence and escalation. In our view, avoiding violence is necessary, but not sufficient. The University also needs to keep protests from interfering with the rights of others to speak, teach, research, and learn. So the University should do more to stop unauthorized protests as they occur, using approaches that are effective but not confrontational.”³²
26. On April 1, 2024, the Columbia Spectator published an article noting that more than 20 Jewish students reported feeling isolated either because of general sentiments or specific incidents on campus. Two students said they left student groups—one a political activist club and one a performing arts group—they once felt part of after those clubs decided to join the CUAD coalition.³³
27. On March 5, 2024, the University received complaints of discrimination from students who walked by tables by Lerner Hall, which is the student center of the University. Both complaints alleged that already banned groups were tabling. One complaint stated that unauthorized groups were tabled and contained “inflammatory, antisemitic language”, such as “globalize the intifada” and providing a Columbia University “power map”, which the complaint alleged was an antisemitic trope referencing the belief that Jews control society. The other complaint alleged there were antisemitic symbols at the table, including a cancel sign over the Kosher symbol. Records reviewed by ED OCR shows that administrators met with students who distributed information and warned them that further distribution would result in “further action.”
28. On March 19, 2024, the University received multiple complaints of discrimination from professors and students regarding an upcoming event titled “Resistance 101.” The event, hosted by Dar, a student organization, was held on March 24, 2024 and featured some external organizations with (1) Masar Badil (2) Samidoun, an external organization affiliated with Popular Front for Liberation of Palestine, and (3) Within our Lifetime. The University kept rejecting applications for venues to host the event, but the event was ultimately held in student residential housing without approval. Students brought in non-residents into the gathering. Based on ED OCR’s document review, it appears that the Student Conduct Office oversaw investigation into the incident and investigated multiple students to determine if they violated University standards of conduct. During the investigation, multiple students were placed on interim suspension starting April 3, 2024. Final determinations were made on June 25, 2024, with the University finding that the majority of the students were not responsible for endangerment, unauthorized access/egress, and disruptive behavior. However, the University found that some of the students were responsible for violating University policy and for failing to comply with the investigation.
29. On April 17, 2024, hundreds of students set up tents on South Lawn beginning at around 4:00 a.m., pledging to occupy the space until Columbia University divested from companies with ties to Israel.³⁴
30. On April 18, 2024, Columbia University Public Safety ordered students to dismantle tents in the South Lawn encampment. By 1:00 p.m., President Shafik authorized the New York Police Department to sweep the “Gaza Solidarity Encampment.” In a letter to the University, before calling in the police, President Shafik stated: “The individuals who established the encampment violated a long list of rules and policies. Through direct conversations and in writing, the university provided multiple notices of these violations, including a written warning at 7:15 p.m. on Wednesday notifying students who remained in the encampment as of 9:00 p.m. that they would be face suspension pending investigation. We also tried a number of channels to engage with their concerns and offered to continue discussions if they agreed to disperse.” Over 100 students were arrested.³⁵
31. On April 19, 2024, the Faculty and Staff for Justice in Palestine at Columbia University called on all faculty to stage an academic boycott “on all academic events” and to boycott Commencement until their demands were met. The group’s demands included a halt to all disciplinary proceedings against students, including lifting suspensions; compliance with CUAD’s proposal to the Advisory Committee on Socially Responsible Investing; removal of the New York Police Department from within and directly outside the Morningside campus; and reinstatement of Columbia University’s chapters of SJP and JVP.³⁶
32. On April 21, 2024, student demonstrators re-erected tents at the “Gaza Solidarity Encampment” in the South Lawn. SJP and CUAD published a joint Instagram post depicting students standing with tents. The caption states, “THE TENTS ARE BACK UP. COLUMBIA ADMIN IS FULLY AWARE. WE WILL NOT BE MOVED UNTIL COLUMBIA DIVESTS.” A University spokesperson wrote to the Columbia Spectator: “Students do not have permission set up tents on the lawn. Those who do are in violation of long-standing University policy and will be identified and subjected to disciplinary action.”³⁷

33. On April 21, 2024, Chief Operating Officer Cas Holloway announced that Columbia University would enhance security measures on the Morningside campus amid the ongoing presence of the “Gaza Solidarity Encampment” and outside protests.³⁸
34. On April 21, 2024, Brian Cohen, Lavine Family Executive Director of Columbia/Barnard Hillel, sent an email to all students on the Hillel mailing list saying that Columbia is not upholding the Rules of University Conduct by allowing protests.³⁹
35. On April 22, 2024, President Shafik announced a same-day shift to virtual classes as a means to “deescalate the rancor” and “give us all a chance to consider next steps.”⁴⁰ That same day, over 100 faculty members from Barnard and Columbia gathered on the Low Steps for a “Rally to Support our Students and Reclaim our University.”⁴¹
36. On April 23, 2024, President Shafik announced a midnight deadline to reach an agreement amid ongoing negotiations with student organizers involved in the “Gaza Solidarity Encampment,” before consideration of “alternative options for clearing the West Lawn and restoring calm to campus so that students can complete the term and graduate.” The statement read: “I fully support the importance of free speech, respect the right to demonstrate, and recognize that many of the protestors have gathered peacefully. However, the encampment raises serious safety concerns, disrupts campus life, and has created a tense and at times hostile environment for many members of our community. It is essential that we move forward with a plan to dismantle it.”⁴²
37. According to a lawsuit filed by a group of students, Columbia University’s administration ultimately agreed to allow both the demonstrators and the encampment to remain in place.⁴³
38. On April 26, 2024, President Shafik, Board of Trustees Co-Chairs Claire Shipman and David Greenwald, and University Provost Angela Olinto announced in a Friday email to the community that the University did not plan to call the NYPD back to campus.⁴⁴
39. On April 26, 2024, the Kraft Center for Jewish Life hosted a press conference calling for Columbia’s administration to take more aggressive action against antisemitism on campus.⁴⁵
40. On April 26, 2024, a student member of CUAD was banned from campus after a video resurfaced of the student stating that “Zionists don’t deserve to live,” and “Be grateful that I’m not just going out and murdering Zionists.”⁴⁶ The CUAD eventually apologized to the student for his treatment, explaining “The anti-blackness and queerphobia that [he] experienced, and continues to experience, from neo-liberals, neo-liberal media, and fascists is disgusting.”
41. On April 29, 2024, President Shafik announced that Columbia University would not divest from Israel and that negotiations with encampment leaders failed. The announcement also stated: “The encampment has created an unwelcoming environment for many of our Jewish students and faculty. External actors have contributed to creating a hostile environment in violation of Title VI, especially around our gates, that is unsafe for everyone—including our neighbors. . . We also do not want to deprive thousands of students and their families and friends of a graduation celebration . . . For all of the reasons above, we urge those in the encampment to voluntarily disperse.”⁴⁷
42. On April 29, 2024, Columbia University began distributing notices at the “Gaza Solidarity Encampment,” informing individuals present that they had until 2:00 p.m. to clear out, identify themselves to a University official, and commit to abiding by University policies.⁴⁸ Shortly after receiving notice of the deadline to clear the encampment, hundreds of individuals began picketing around the “Gaza Solidarity Encampment.” This followed a 1:00 p.m. rally at the Sundial organized in part by CUAD. The rally was held in support of “students threatened with mass suspension and eviction” and to “protect the encampment.”⁴⁹
43. On April 29, 2024, Columbia University began suspending students remaining in the “Gaza Solidarity Encampment.” The school further urged protesters to clear the encampment to allow for continued construction in preparation for Commencement, which was scheduled to occur on May 15, 2024.⁵⁰ On April 30, 2024, dozens of protesters occupied Hamilton Hall in the early hours, moving metal gates to barricade the doors, blocking entrances with wooden tables and chairs, and zip-tying doors shut. Protesters carrying barricades entered Hamilton Hall through the leftmost door of the building at approximately 12:30 a.m. Shortly after, a protester broke the window of the rightmost door as dozens more formed a human barricade directly outside the doors. Within minutes, protesters sealed the building while hundreds more flooded in front of the building.⁵¹

44. In a complaint from a Columbia University employee who was working in Hamilton Hall on that night, which was filed with the federal government and provided to Columbia University, the employee stated, “It is unclear . . . how these individuals managed to get into Hamilton Hall—or what, if anything, campus security did to confront or stop them. Hamilton Hall is locked from approximately 10:00 p.m. until 6:00 a.m. During those hours, only authorized Columbia employees are able to enter the building. Authorized persons must use their electronic ID cards to swipe into Hamilton Hall (and access by non- authorized campus ID cards is disabled during that time.) [The employee] believes that a door may have been left ajar for the trespassers. He had seen doors to Hamilton Hall left ajar before while working the overnight shift. He reported the problem to his supervisors several times, explaining that he did not feel safe. Still, Columbia did not increase the security presence at Hamilton Hall. . . . [The employee] told his supervisors that the encampment made him feel unsafe because he did not know who was in the encampment or whether any demonstrators had weapons. He also did not know what the demonstrators might have been storing in or among the tents. On the night of April 25, 2024, one of [the employee’s] colleagues found a woman hiding in a ‘slop sink’—a sink used for the disposal of waste water— inside Hamilton Hall after hours.”
45. In the same complaint, that employee noted that on the night of April 29, 2024, “[he] was cleaning the third-floor classrooms, . . . [and] [s]uddenly . . . saw a handful of masked people in the room with him. Then dozens more masked individuals appeared. In an instant, he was surrounded. [The employee’s] first thought was the safety of a colleague who was also cleaning the third floor at the time. A masked man and woman approached him and demanded that he leave. Unwilling to abandon his colleague, [the employee] refused and told the man and woman to get out. When [the employee] demanded that they let him out of the building, they replied, ‘It’s over,’ and, ‘It’s too late.’ [The employee] had no idea that all the while rioters had been zip-tying shut the exits on the ground floor of Hamilton Hall. [The employee] began searching for a way out of the building. He opened a window, but decided the jump from the third floor was too dangerous. He realized that he would have to push his way out down the stairs and through the masked mob. An unmasked woman and a masked man barked orders at the rioters, directing them to different areas of Hamilton Hall. Some rioters were rushing in with cases of water and food. Others were carrying rolled-up mattresses. Still others were carrying tape and rope. All the while, rioters carried tables and chairs from classrooms and moved vending machines to barricade the building’s entrances and exits from the inside. All this occurred in a matter of minutes. [The employee] felt he was trapped and his life in danger. As he attempted to push his way through the mob, people struck him and shoved furniture into him. Everywhere he went, he was followed by two masked men. As [the employee] pushed his way through the crowd, he was confronted by a masked man in a Columbia sweatshirt who began violently shoving him. A group of masked individuals stood with the man in the sweatshirt, including the two men who had been following him around the building. . . His accosters shouted, ‘What are you, a Jew-lover?’ They repeatedly called him ‘Jew- lover.’ The masked man in the Columbia sweatshirt became more aggressive. He kept shoving [the employee] and standing in his way. In the struggle, [the employee] managed to remove the mask from man’s face along with the hooded sweatshirt the man was wearing. The man shouted to the other rioters, ‘How can you let him do that to me?’, indicating to [the employee] that the man had some sort of authority over the mob. The man [the employee] unmasked then threatened him, saying, ‘I’m going to get twenty guys up here to fuck you up.’ . . . Throughout this confrontation, one of the two men who had been following [the employee] kept striking him on his back. [The employee] again called out for his colleague and, hearing no response, proceeded to push his way through the rioters toward one of the exits. He found that the doors had been sealed shut with zip ties and bike chains and blocked by heavy furniture. [The employee] went to a second exit and found that it was likewise sealed shut with zip ties and bike chains and obstructed with furniture. Finally, he reached an exit that was sealed with a bike lock and zip ties but was not blocked by furniture. He demanded that he be released from the building. Eventually, an individual cut the zip ties and let [the employee] out.”
46. Another Columbia University employee who was also working in Hamilton Hall on that night filed a complaint that read: “He feared for his life as he was surrounded by masked individuals who were shouting and shoving him. He pushed his way downstairs to the lobby, where he found that the doors had been barricaded with furniture. He began pushing the furniture aside, only to find that the doors had been sealed shut with zip-ties and bike chains. He ran for an alternative exit but found that it had been barricaded with furniture and a vending machine. [He] stood in the lobby and begged the rioters to let him out of the building. He recalls saying, ‘I work here. Let me out.’ The rioters responded by laughing at him and mocking him. He remembers being told, ‘You work for the Jews,’ and ‘You’re a Zionist.’ Eventually, someone opened a door and [he] was physically pushed out of the building.”
47. On April 30, 2024, Columbia University indefinitely restricted access to its Morningside campus to students residing in on-campus residence halls and essential personnel, according to a Tuesday morning email from the Emergency Management Operations Team. The conditions were scheduled to remain “until circumstances allow otherwise.”⁵²

48. On May 6, 2024, President Shafik announced that the University-wide Commencement ceremonies, initially scheduled for May 15, 2024 had been canceled, and that Class Days would take place at the Baker Athletics Complex and other off-campus locations. The decision was based on discussions between deans, faculty who work directly with students, and student leaders.⁵³
49. On May 15, 2024, the Columbia University Vagelos College of Physicians and Surgeons held its Graduation Day.
50. The nondiscrimination policy in effect during May 2024 was administered by the Office of Equal Opportunity and Affirmative Action (EOAA Office), which is now part of the Office of Institutional Equity (OIE).
51. In September 2024, the University replaced the provisions of the Standards & Discipline concerning discrimination and discriminatory harassment with the Anti-Discrimination Policy for Students, and in January 2025, the University replaced the EOAA Policy with the Anti-Discrimination Policy for Faculty and Staff. The policies are now administered by OIE.
52. The Anti-Discrimination Policy for Students and the Anti-Discrimination Policy for Faculty & Staff contain expanded procedures that sought to enable the University to respond more effectively to reports of discrimination and discriminatory harassment from across the University community.
53. On May 16, 2024, the Columbia University Antisemitism Taskforce published an Op-Ed in the Columbia Spectator detailing the harassment reported by Jewish students during taskforce listening sessions. It noted: "Another consistent theme in our listening sessions was the discomfort and fear that the increasingly violent and threatening rhetoric at protests and on Sidechat and other social media platforms engenders. Students who are visibly Jewish, because they wear kippot or six-pointed stars, or have mezuzahs on their dorm room doors, feel especially threatened. We hear stories about these Jewish insignia being torn down or pulled off of students' bodies. Jewish students' families and friends ask them if they are all right; Jewish prospective students ask them if they would be safe at Columbia. Some students are afraid to walk across campus, or to use the libraries."⁵⁴
54. On May 31, 2024, roughly two dozen pro-Palestinian protesters occupied the west side of South Lawn at 7:00 p.m. during Columbia University's annual alumni reunion, demanding that the University divest from companies with ties to Israel and to provide full financial transparency of its direct and indirect investments. Columbia Public Safety Officers began removing tents.⁵⁵
55. On June 4, 2024, Plaintiff C.S. and Defendant Trustees of Columbia University in the City of New York agreed on a stipulation that dismissed the original lawsuit *C.S. v. Trustees of Columbia University*, 24-cv-03232-AT-SN (S.D.N.Y. 2024).⁵⁶
56. In June 2024, some of the students undergoing the student discipline process as a result of their involvement in the encampment and/or occupation of Hamilton Hall began receiving letters stating that their cases were being transferred to Rules for further evaluation. ED OCR understands this to be a reference to the University Senate Rules of University Conduct Committee (Rules Committee). The University website states that, as a result of listening forums held in February 2024, the Rules Committee updated its guidelines over the summer to "reassert the primacy of the Rules process as the appropriate mechanism for resolving disciplinary matters connected to demonstrations, protest, etc."
57. On June 10, 2024, a student submitted a report that an anonymous University affiliate posted a photo of her child on Sidechat. As part of the University's response, a representative of the University's Doxing Resource Group informed the student that the University had contracted with a consulting firm that could help students assess their personal information on the internet, remove information that is feasible to remove, provide additional guidance on mitigating the impact of doxing, and provide the student with a 1-year subscription service to assist with ongoing data scrubbing at no cost to the student.
58. On July 10, 2024, campus was restricted to CUID holders, and parts of campus were restricted. Chief Operating Officer Cas Holloway announced a tiered, color-coded system on July 10 for campus access.⁵⁷
59. On August 14, 2024, President Shafik resigned.⁵⁸
60. On August 30, 2024, Columbia University published a second antisemitism Taskforce report titled, "Report #2 *Columbia University Student Experiences Of Antisemitism And Recommendations For Promoting Shared Values And Inclusion Task Force On Antisemitism*" (Report #2). This involved interviews with almost 500 students and covered student experiences with antisemitism in Columbia's dorms, extracurricular clubs, curriculum, and during protests and demonstrations.⁵⁹

61. Report #2 stated that during the protests, students heard language embracing violence against Jewish people, such as “Al-Qassam you make us proud, kill another soldier now,” “Yes Hamas, we love you, we support your rockets, too,” or “We say justice you say how, burn Tel Aviv to the ground.”⁶⁰
62. Report #2 also captured students’ concerns that the rules regarding protests were not enforced or publicized. It found: “Students pointed out a crucial fact exacerbating these tensions: a majority of students do not know the University’s guidelines surrounding protesting on campus. One student discussed the dangers of gatherings being held without students knowing ‘what kind of rules they are breaking.’ Some students felt that the administration was slow to provide students with a clear reminder of what was and wasn’t allowed when protesting on campus. Many students objected to face masking, though they interpreted masking in different ways. Some believed it was directly related to the University’s failure to identify what hate speech is. Others saw it as proof that the protesters knew they were violating rules and wanted to be insulated from discipline and other consequences.”⁶¹
63. Report #2 also summarized Israeli students’ repeated exposure to harassment. It found: “Israeli student experiences underscore a feeling of having been abandoned by the University administration. They see the University’s failure to enforce rules, as well as the University’s negotiations with leaders who called for the death of Zionists and the destruction of Israel as legitimizing the hatred directed at Israeli students. As one student respondent in a survey of Israeli students noted, Columbia ‘not only failed to keep its students safe, it allowed discrimination from both students and faculty.’”⁶²
64. Like Report #1, Report #2 noted a common theme of unresponsiveness by Columbia University. “The listening sessions were marked by frustration with the administration. The majority of students who came to the sessions felt that the administrations of their various schools were late to respond, if they responded at all, and did so in an inconsistent way. To be clear, these students were not asking for protection from ideas or arguments. Many of the incidents that students reported involved being verbally attacked and spit on walking on Broadway because they were wearing kippahs. One student who reported this to the Office of Diversity was told, in response, that there was no reason to feel unsafe; and that if the student was feeling unsafe, perhaps they should leave campus. In another case, a program director refused to meet with a student after they made their complaint.”⁶³
65. Report #2 stated that: “For many students, the University’s shortcomings with accountability are inseparable from its reluctance to discipline various forms of hatred and enforce its own rules. Students feel that the University simply does not take antisemitism seriously. One student said they felt as though “the threshold for [reprimanding] antisemitism was higher [than for other forms of hate].” We also heard the sentiment that the University failed to discipline anti-Israel hate. One student said they had seen communications regarding anti-Palestine hate, antisemitism, and Islamophobia, but no mention of anti-Israel hatred. Anti-Zionist students who attended the listening sessions also felt that the University had failed to discipline what they considered discriminatory or harassing speech.”⁶⁴
66. On September 4, 2024, a student who identified as “visibly Jewish” attended a protest where Pro-Palestinian protesters were handing out flyers. Some of the flyers had QR codes which included statements/quotes from Al-Aqsa Martyrs Brigade. Other flyers included the statement “No Zionists on Campus.” Reports regarding this conduct were also submitted by staff/faculty members who were designated as mandated reporters. The University responded to the student’s complaint confirming receipt and providing a copy of the University’s policy and procedure regarding discrimination and support resources.
67. The same student also complained that on September 6, 2024, several Pro-Palestinian groups engaged in misconduct during a Student Life fair. The student alleged that several suspended groups were now operating under the non-suspended CUAD and distributing the same materials. The student reported that materials included quotes from former Hamas leader Hasan Nasrallah, which made him feel nervous. He also reported that he was harassed on Instagram and wished to report that harassment. Columbia University records indicate that the school investigated the Pro-Palestinian groups at the fair but the record did not contain evidence that the University made any findings or engaged in any follow up actions regarding the fair.
68. On September 23, 2024, Columbia University published its updated Anti-Discrimination and Discriminatory Harassment Policy.⁶⁵
69. On September 24, 2024, Interim President Armstrong announced that Columbia University would continue to restrict access to CUID holders. She also announced plans to adjust the presence of security on campus and unveiled a simplified campus access system.

70. On October 5, 2024, Interim President Armstrong announced that any new requests for guest access to the Morningside campus would not be approved in anticipation of activity related to the anniversary of the October 7, 2023 attacks on Israel.
71. On October 7, 2024, CUAD advertised a protest that included a famous image of Palestinians celebrating a lynching in Ramallah and a caption stating that the struggle is moving “to a new phase of escalation.”
72. The protests included hundreds of students and the pro-Palestinian group and pro-Israel group were assigned to different sides of the main lawn. Both sides used noise amplification; the pro-Israel students complained that they were asked to lower their volume but the pro-Palestinian students were not asked to do so. The pro-Palestinian protestors eventually began to march around the lawn, which had not been authorized by the University, and there were complaints from students that this disturbed their ability to learn in the classrooms. Various complaints were also filed about the anti-Zionist slogans on signs, the Jewish students being asked to lower their volume, and that Jewish students were locked in the Low Library by Columbia Public Safety for their own safety while pro-Palestinian students passed by.
73. Complaints were referred to the OIE, which conducted numerous witness interviews about the event and how it impacted students and staff, and worked with Campus Safety to identify individual student participants. The OIE issued a notice of allegations in November 2024 to CUAD and SJP, stemming from the October 7 protest. These allegations included unauthorized marching and protest in the immediate vicinity of the art installation where community members were mourning, blocking walkways and staircases from the community, publishing certain images and text on Instagram, displaying materials with a QR code linking to the website for a designated terrorist group, etc. The notice stated that the allegations would be processed under a formal investigation and determination procedure, but there is no indication in the materials ED OCR reviewed as to what the outcome was.
74. A Columbia University student also filed a complaint that she was accosted verbally and physically by masked pro-Palestinian protestors while trying to get to class. The University found no conduct violation because they could not substantiate that claim or identify any individuals through CCTV footage or interviewing the complainant, but they did refer that complaint to OIE. The materials reviewed by ED OCR did not indicate further follow up by the University.
75. On October 9, 2024, the Columbia University Office of the President issued an announcement titled “Updates for Our Community Calls for Violence Have No Place at Columbia.”⁶⁶ It read: “Statements advocating for violence or harm are antithetical to the core principles upon which this institution was founded. This has seemed so fundamental that it did not require saying; to hear such things in our community is an aberration, whether or not protected by the First Amendment. We must be clear: calls for violence have no place at this or any university.”
76. On October 31, 2024, the Committee on Education and the Workforce Republican Staff published a report titled “Antisemitism on College Campuses Exposed.”⁶⁷ The report states “Columbia’s leaders offered greater concessions to encampment organizers than the University has publicly acknowledged. These concessions included offering formal reviews of divesting from companies deemed by encampment leaders to violate international law or which manufacture specified categories of weapons; providing amnesty for many of the students in the encampment; funding scholarships connected to the West Bank and Gaza; and creating a “resilience fund” for Gaza.”
77. On November 9 and 10, 2024, Alpha Delta Phi Society (ADPS), a University-affiliated literary society student group, hosted an art exhibit at its brownstone building. The exhibit was created by the “Hinds House Collective.” ADPS advertised for the exhibit on social media and on campus. The exhibit included art works as well as speakers and workshops. Some examples of the art included depictions of Jewish symbols splattered in red; a work with the phrase, “so on that day the people of Gaza drifted into the sky like a host of colorful dragonflies,” in an apparent reference to members of Hamas that used paragliders during the October 7 attack; red headbands from the Popular Front of the Liberation of Palestine; and a pool table full of tools used in the occupation of Hamilton Hall in the Spring of 2024 with a sign reading, “No touching! Don’t get fingerprints on these items.”
78. Two Jewish students that attended the exhibit filed a complaint with the OIE, alleging discriminatory harassment based on shared ancestry. OIE opened a formal investigation. OIE interviewed the complaints and interviewed a representative from ADPS. OIE also reviewed social media posts related to the event and images, recordings/video from the exhibit. At some point, OIE created an “Anti-discrimination and Discriminatory Harassment Report” related to the Hinds House incident,” though the version reviewed by ED OCR is undated. The 43-page report reviews the evidence in the investigation and applies the hostile environment legal standard to the evidence in the investigation. OIE concluded that those expressions leading up to and at the exhibit crossed the line into discriminatory harassment and created a hostile environment.

79. In November 2024, the University received reports regarding a stickering campaign which targeted various University officials regarding their funding of Israel and climate damaging industry and various public safety officers who had previous misconduct complaints against them. One bunch of stickers were aimed at pressuring the school to divest from Israel and included phrases like, “How much genocide is too much genocide?” and “How many war crimes need to be committed before Columbia divests?” Another group of stickers targeted individual trustees. The stickers were found to be both on campus (Journalism school, Philosophy Hall) and off campus. There are police reports of students with faces covered with Keffiyehs placing stickers in the stairwell. One of the students responsible for the stickering was caught making the stickers in the residence hall and was charged with a student conduct violation. When an individual submitted a report regarding the stickers, the University thanked them for the report and attached a copy of the discrimination and harassment policy and procedures which included some support resources. The University removed stickers on their property when they were found and responded to individual complainants with confirmation emails and provided copy of the discrimination and harassment policy and procedures which included some support resources.
80. On November 13, 2024, the Columbia Office for Public Safety launched a pilot program to remove CUID access restrictions on most buildings during normal operating hours.⁶⁸
81. On November 21, 2024, dozens of pro-Palestinian demonstrators protested an event featuring CNN analyst Barak Ravid, an Israeli journalist, held at the Kraft Center for Jewish Student Life.⁶⁹ As attendees of the Kraft Center event were ushered through the metal barricades by NYPD officers, protesters continued to chant, “Hillel you can’t hide, you invest in genocide” and “Over a hundred thousand dead, Robert Kraft your hands are red.” Students also chanted, “Make sure Hillel knows, we’ll be back.” The University received several reports from students, staff Delegates, and Mandated Reporters alleging that the protest contributed to a hostile environment on campus for Jewish students. OIE interviewed students and staff to gather factual information about the protest, gather information about how the protest impacted students and staff, and discuss supportive resources with students. OIE also worked with Campus Safety in an attempt to identify individual participants. ED OCR did not review documentation indicating whether the University made a determination of a hostile environment or otherwise took steps to address the impact of the protest.
82. Between December 4 and December 9, 2024, OIE received emails from a faculty member alleging that other faculty and/or staff were supporting a “Read-In” at Butler Library which included a newspaper created by SJP and distributed/endorsed by CUAD and FSJP titled, “The Columbia Intifada.” Specifically, the newspaper called for violence against Jewish people with statements including, “the colonized man liberates himself in and through violence,” and calling for “intifada.” The University pulled the Columbia University ID access logs for December 4, 2024, at Butler Library and identified individuals who entered at a certain time, and reviewed video footage of staff setting up the event.
83. During the weeks of January 6, 2025, and January 13, 2025, the University Judicial Board held disciplinary hearings during winter break for student protesters who participated in the April 17, 2024, “Gaza Solidarity Encampment” on the South Lawn.
84. On January 21, 2025, a group of protesters wearing masks and Keffiyeh scarves interrupted the first session of the History of Modern Israel class during the first day of spring semester classes. Protesters distributed flyers to the class depicting a boot stomping on the Star of David with the words “Crush Zionism,” and depicting an individual in a Keffiyeh holding a burning Israeli flag with the words “Burn Zionism to the ground.” Approximately five minutes after entering the classroom, the protesters exited while shouting “Free Palestine.”⁷⁰
85. On January 22, 2025, the Columbia University Office of Public Affairs issued a statement regarding actions taken in response to The History of Modern Israel class disruption.⁷¹
86. On January 23, 2025, Columbia University suspended an individual who disrupted the History of Modern Israel class, pending a full investigation and disciplinary process.⁷²
87. On January 24, 2025, Columbia University restricted Morningside campus access to CUID holders only.⁷³

88. On February 3, 2025, nearly 200 faculty members sent a letter to Interim President Armstrong advocating for additional safety measures for Jewish students.⁷⁴ The letter included 10 recommendations on how the University can protect and support its Jewish students. The recommendations include implementing a mask ban, enforcing time, place, and manner regulations, establishing stricter disciplinary procedures, and announcing a date for the opening of the Global Center in Tel Aviv. The faculty members also called on Interim President Armstrong to adopt the International Holocaust Remembrance Alliance's working definition of antisemitism, which notes that antisemitism "might include the targeting of the state of Israel, conceived as a Jewish collectivity." The faculty members wrote that the University's central administration should reinstate and enforce time, place, manner restrictions, rather than the University Senate or University Judicial Board.
89. On February 13, 2025, the US House Committee on Education and the Workforce wrote a letter to Interim President Armstrong and Co-Chairs of The Trustees of Columbia University David Greenwald and Claire Shipman requesting that they produce disciplinary records for incidents spanning from April 2024 to January 2025, citing a "continued failure" to address antisemitism on campus.⁷⁵
90. On February 18, 2025, Interim President Armstrong sent an email to the Columbia University community announcing that the President's Advisory Committee on Institutional Voice began the "challenging and urgently needed work" of recommending steps to achieve institutional neutrality by the end of the 2024-25 academic year.⁷⁶ Interim President Armstrong announced the creation of the committee five months earlier on September 17, 2024.
91. On February 19, 2025, OIE launched a new mandatory online training for all Columbia students titled, "Anti-Discrimination and Discriminatory Harassment Policy and Procedures for Students." Students were required to complete the training by March 24, 2025, or risk losing access to University systems.⁷⁷
92. On March 13, 2025, some of the students who occupied Hamilton Hall in April 2024 were suspended.⁷⁸
93. On March 28, 2025, Interim President Armstrong resigned.

IV. Notice of Violation

Our findings do not constitute a plenary determination on all potential Title VI violations against Jewish students from October 7, 2023, through the present. Columbia University has received civil rights complaints that remain pending before its OIE, Center for Student Success and Intervention (CSSI), University Judicial Board, and Deans' offices. There is also ongoing litigation brought by student groups in federal court. It is beyond the scope of this review to analyze each of those claims and may unfairly deprive those students of an opportunity to have their individual complaints addressed on their own merits.

Rather, our review focuses on key events identified below that have been sufficiently verified through various sources, including Columbia University's own reports from their Taskforce on Antisemitism, onsite interviews, Columbia's response to HHS OCR's data request, reliable news sources, and our review of Columbia University's own policies and procedures. In this light, we address Columbia University's liability under Title VI. As stated above, a university may be held civilly liable under Title VI for its deliberate indifference to student-on-student harassment. *Zeno*, 702 F.3d at 665. A Title VI violation is established when it can be shown that: (1) individuals associated with the institution were subject to severe or pervasive harassment, and that the harassment was motivated, at least in part, by race, color, or national origin; (2) the institution had actual knowledge of the harassment; (3) the institution had the ability to exercise substantial control over the harassers; and (4) the institution was deliberately indifferent to the harassment. See *Id.* Based upon our investigations, HHS OCR and ED OCR jointly find that Columbia University acted with deliberate indifference towards student-on-student harassment in violation of Title VI.

1. Jewish students at Columbia University were subject to severe and pervasive harassment from October 7, 2023, through the present, denying them equal access to educational opportunities and benefits.

The harassment and discrimination that Jewish students experienced at Columbia University denied them equal access to educational opportunities or benefits by creating a hostile environment. As discussed in Section I, Part 1, denial of an "educational opportunity or benefit" may take the form of a literal, physical deprivation, such as when a victim is hospitalized due to injuries, but it may also include psychological deprivation of a benefit, as demonstrated by academic decline or developing behavioral or anxiety disorders. See *Roe*, 678 F. Supp. 2d at 1028 (listing examples of deprivation).

A hostile environment against Jewish students existed at Columbia University from October 7, 2023, through the present for at least four reasons, taken together. *First*, protesters engaged in threatening, intimidating and at times physically harming actions against Jewish students. *Second*, there were many acts of vandalism directed towards Jewish students—including swastikas graffitied on classroom walls. *Third*, there was harassing speech directed towards Jewish students—such as calls for genocide or the murder of Israelis. *Fourth*, taken together, these actions by students and others on Columbia University's campus from October 7, 2023, through the present denied Jewish students equal access to certain educational opportunities or benefits, including, but not limited to, the ability to enter classrooms and attend class in-person, to walk across campus without intimidation or harassment, and to use public facilities such as the library and research centers. We address each in turn below.⁷⁹

A. Harassment at protests.

First, we find that numerous actions taken by protestors on Columbia University's campus since October 7, 2023, through the present—threatening, intimidating, and at times physically harming Jewish students—contributed to a hostile environment. As the *Gartenberg* court observed, “threatening or humiliating” Jewish students by blocking access to classes and buildings and subjecting Jewish students to other “fear-inducing conduct” such as “protestors surround[ing] and intimidat[ing]” them, is not protected by the First Amendment. 2025 WL 401109, at *16.

Since the attacks on October 7, 2023, Columbia University's Jewish students have reported feeling attacked or harassed, either in-person or online; avoided or stayed off campus; and hid or veiled their Jewish identity while walking around campus.⁸⁰ As far back as November 10, 2023, Columbia University knew that student groups like SJP and JVP “repeatedly violated University policies,” including holding “unauthorized events that proceeded despite warnings and included threatening rhetoric and intimidation.”⁸¹ According to Columbia University's internal First Task Force Report, “Protesters have disrupted classes and events, taken over spaces in academic buildings, held unauthorized demonstrations, and used ugly language to berate individuals who were filming these protests or just walking by. There also have been reports of physical harm to students, including Columbia affiliates who were protesting against Hamas and Columbia affiliates who were protesting against Israel.”⁸²

We identified several protests which violated the University's own policies. One significant episode we identified over the course of our two investigations transpired at Columbia University's Morningside campus between April and May of 2024. On April 17, 2024, hundreds of students set up tents on South Lawn beginning at or around 4:00 a.m., pledging to occupy the space until Columbia University divested from companies with ties to Israel.⁸³ On Thursday, April 18, 2024, Columbia University's Public Safety ordered students to dismantle tents in the South Lawn encampment, and by 1:00pm, President Shafik authorized the NYPD to sweep the encampment—over 100 students were arrested, noting that “[t]he individuals who established the encampment violated a long list of rules and policies.”⁸⁴

Yet within a few days, on April 21, 2024, student demonstrators re-erected tents at the “Gaza Solidarity Encampment” in the South Lawn.⁸⁵ On April 23, 2024, President Shafik announced a second midnight deadline to reach an agreement, noting that “the encampment raises serious safety concerns, disrupts campus life, and has created a tense and at times hostile environment for many members of our community.”⁸⁶ But despite these announcements and the move to virtual classes, Columbia University's administration agreed to allow both the demonstrators and the encampment to remain in place.⁸⁷

And, on April 30, 2024, dozens of protesters occupied Hamilton Hall on Columbia University's campus early that morning, moving metal gates to barricade the doors, blocking entrances with wooden tables and chairs, and zip-tying doors shut.⁸⁸ Shortly after, a protester broke the window of the rightmost door as dozens more formed a human barricade directly outside the doors. Protestors quickly sealed the building while hundreds more flooded in front of the building.⁸⁹ On May 6, 2024, President Shafik announced that the university-wide commencement ceremonies scheduled for May 15 were canceled.⁹⁰

These protests violated Columbia University's own policies regarding time, place, manner restrictions, which were intended to protect *all* students from harassment and discrimination. On October 24, 2023, the University added a new section to the University Event Policy webpage emphasizing power to regulate the “time, place, and manner of certain forms of public expression” to prevent harassment and ensure safety.⁹¹ Additionally, when Columbia University adopted its Anti-Discrimination and Discriminatory Harassment Policies for Students, the University noted the particular importance of where speech or conduct occurs in creating barriers to access educational programs and activities, listing as a factor:

Whether the Complainant had any alternative to being subjected to the alleged speech or conduct. For instance, the Office will consider whether the alleged speech or conduct took place in a location the Complainant had to enter or pass by in order to access any of the University's programs and activities and whether the Complainant could have chosen to avoid the alleged speech or conduct without detriment to the Complainant's ability to access any University programs or activities.

This factor acknowledges that the place and duration of many protests or demonstrations had occurred in classrooms, educational buildings, and at or near residential and dining facilities, depriving students of Columbia's educational benefits and opportunities.

More important than violating university policies, however, these protesters *did* in fact harass and physically harm Jewish students, denying them the ability to walk across campus and attend class safely, and causing them to fear for their own physical safety. Indeed, Columbia University's internal Antisemitism Task Force published an Op-Ed on May 16, 2024, shortly after the April encampments, detailing the harassment reported by Jewish students:

Another consistent theme in our listening sessions was the discomfort and fear that the increasingly violent and threatening rhetoric at protests and on Sidechat and other social media platforms engenders. Students who are visibly Jewish, because they wear kippot or six-pointed stars, or have mezuzahs on their dorm room doors, feel especially threatened. We hear stories about these Jewish insignia being torn down or pulled off of students' bodies. Jewish students' families and friends ask them if they are all right; Jewish prospective students ask them if they would be safe at Columbia. Some students are afraid to walk across campus, or to use the libraries.⁹²

Our review of the record indicates that most of these forms of harassment were reported to Columbia University.

On May 31, 2024, roughly two dozen pro-Palestinian protesters occupied the west side of South Lawn at 7:00 p.m. during Columbia University's annual alumni reunion, demanding that the University divest from companies with ties to Israel.⁹³ On August 30, 2024, Columbia University's internal Antisemitism Task Force issued a second report noting: "Many of the incidents that students reported involved being verbally attacked and spit on walking on Broadway because they were wearing kippahs."⁹⁴ We find that these and other actions contributed to a hostile environment for Jewish students.

Indeed, the harassment during these campus protests prompted the filing of a class action lawsuit against Columbia University on April 29, 2024, by a Jewish student on behalf of herself and others similarly-situated,⁹⁵ and which resulted in settlement on June 4, 2024.⁹⁶ Among other conditions, Columbia University was required to provide a "Safe Passage Liaison" in response to any student requests for an escort, available 24 hours per day 7 days a week, through at least December 31, 2024.⁹⁷ While Columbia University took a positive step in entering this settlement, we remain concerned that: (1) Jewish students at the University would require the availability of a 24-hour safety escort to simply attend class; and (2) that it took the filing of a lawsuit for the University to meaningfully provide for their safety.

Finally, we find that certain forms of masking at protests contributed to a hostile environment at the University by fostering a sense of fear among students. In addition, the use of masks to hide the identities of protestors made it harder to enforce nondiscrimination laws and university rules of behavior.⁹⁸ For example, on January 21, 2025, a group of protesters wearing masks and Keffiyeh scarves interrupted the first session of the History of Modern Israel class, and distributed flyers to the class depicting a boot stomping on the Star of David with the words "Crush Zionism" and an individual in a Keffiyeh holding a burning Israeli flag with the words "Burn Zionism to the ground."⁹⁹

B. Discriminatory vandalism

Second, we find that many of the acts of vandalism directed towards Jewish students at Columbia University contributed to a hostile environment. As we note above, acts of vandalism are generally not afforded First Amendment protections. See *Gartenberg*, 2025 WL 401109, at *16 ("The act of tearing down posters drawing attention to the abduction of Israelis, just days or weeks after a horrific antisemitic terror attack, [sends] an unmistakable message of national-origin-based hostility to [the university's] Jewish students.").

Yet, as early as October 27, 2023, a swastika was found drawn on the bathroom wall on the fourth floor of the International Affairs building, and while Columbia University notified the NYPD, it is unclear when the swastika was removed.¹⁰⁰ Acts of antisemitic vandalism continued throughout the relevant time period. For example, "[i]n or around November 2023, individuals began to regularly leave obscene and racially charged graffiti, including graffiti of swastikas, on the blackboards in classrooms in Hamilton Hall. [An employee] saw swastikas on the chalkboards more times than he can recall. . . . But no matter how many times [he] removed the swastikas, individuals kept replacing them with more. They were so offensive, and Columbia's inaction was so frustrating, that one of [the employee's] colleagues eventually began throwing away chalk that had been left in the classrooms so vandals would not have anything to write with." These allegations were corroborated by a second complaint we reviewed from another Columbia University employee who was also on the school's cleaning staff.

And, in November 2024, Jewish students complained of a stickering campaign which targeted various University officials regarding their funding of Israel. Some stickers were aimed at pressuring the school to divest from Israel and included phrases like, "How much genocide is too much genocide?" The stickers were found both on campus (Journalism School, Philosophy Hall) and off campus, and the complaints ED OCR reviewed contained police reports of students with faces covered with Keffiyehs placing stickers in the stairwell. Stickering, as an unauthorized defacement of university property or "the private property of another person" is considered vandalism.¹⁰¹ Vandalism and destruction of property is expressly prohibited by Columbia University's Standards and Discipline.

These acts of vandalism contributed to a hostile environment for Jewish students.

C. Harassing speech

Third, we find that certain harassing speech that was directed towards Jewish students—such as calls for genocide or the murder of Israelis—contributed to a hostile environment. The First Amendment does not "require courts to shield all 'derogatory epithets' of marginal value or to protect speech 'even about political matters, that is so persistent or patently harassing that it could not be reasonably designed to contribute to reasoned debate.'" *Gartenberg*, 2025 WL 401109, at *11. Indeed, Columbia University itself recognized this distinction, updating its Event Policy and Campus Resources FAQ page on December 7, 2023, to make explicit that calls for genocide against Jews violates the University's rules: "Calls for genocide against the Jewish community or any other group are abhorrent, inconsistent with our values and against our rules."¹⁰²

Yet, such harassing speech continued on Columbia University's campus from October 7, 2023, through the present. For instance, on February 29, 2024, Eden Yadegar testified before the United States House of Representatives Committee on Education and the Workforce: "At Columbia University, the Jewish community is alone. We are ostracized, mocked, harassed, assaulted, and scapegoated, simply because of our identities. Students have removed their kippot and Jewish star necklaces for fear of becoming a target on campus. We cautiously map the routes we take to class to avoid being yelled at, spit on, accused of committing genocide, or threatened by calls for genocide."¹⁰³ Columbia University internal Task Force's Report #1 (published on March 4, 2024) stated that "many [Jewish students] have heard chants at protests like 'Globalize the Intifada' and 'Death to the Zionist State' as calls for violence against them and their families."¹⁰⁴ Columbia University internal Task Force's Report #2 (published on August 30, 2024) stated that during the protests, students heard language embracing violence against Jewish people, such as "Al-Qassam you make us proud, kill another soldier now," "Yes Hamas, we love you, we support your rockets too," and "We say justice you say how, burn Tel Aviv to the ground."¹⁰⁵

As noted above, such speech—e.g., calls for the destruction of Israel and for the murder of Israelis—constitutes “derogatory epithets” of marginal value” because they are “so persistent or patently harassing that it could not be reasonably designed to contribute to reasoned debate.” *Gartenberg*, 2025 WL 401109, at *11. Moreover, even if some of the speech outlined above could arguably constitute political discourse that is offensive but protected under the First Amendment, “even facially neutral words and phrases [such as ‘[f]rom the river to the sea, Palestine will be free’] can be highly probative of discriminatory intent depending on the circumstances and social context in which they are communicated,” e.g., “when uttered just two weeks after the deadliest massacre of Jews since the Holocaust in a manner that reasonably appears to celebrate and glorify that same violence.” *Id.* at *13. Here, we find that the statements set forth above contributed to a hostile environment for Jewish students.

D. Denial of access to educational opportunities and benefits

Fourth, we find that these actions, taken together, denied Jewish students at Columbia University equal access to certain educational opportunities or benefits, including, but not limited to, the ability to enter classrooms and attend class in-person, to walk across campus without intimidation or harassment, to use public facilities such as the library and research centers, and to attend their 2024 University-wide commencement ceremony.

For instance, on November 30, 2023, CUAD protestors formed a “hallway of shame” on the steps leading to the Low Library during a SIPA, which Columbia University is alleged to have suggested to its Jewish students to avoid by using a side door (which was later also blocked by the protestors).¹⁰⁶ Another student alleged that they felt unsafe working on campus and instead primarily worked remotely, citing an incident where protestors blockaded the entrance to the Hammer Health Sciences Building.¹⁰⁷ These allegations were supported by Columbia University’s internal Task Force Report, which stated: “Protesters have disrupted classes and events, taken over spaces in academic buildings, held unauthorized demonstrations, and used ugly language to berate individuals who were filming these protests or just walking by.”¹⁰⁸ The same report recommended that Columbia University “keep protests from interfering with the rights of others to speak, teach, research, and learn” and “do more to stop unauthorized protests as they occur, using approaches that are effective but not confrontational.”¹⁰⁹

We also find that the cancellation of the May 2024 university-wide commencement, combined with the 20-day encampment leading up to that cancellation, constitutes a deprivation of educational benefits and opportunities for Jewish students as part of a hostile environment. Even a single event, if sufficiently egregious, can give rise to a hostile environment claim. See *Cadet*, 632 F. Supp. 3d at 229. Here, the cancellation of the May 2024 commencement following twenty days of unlawful encampments that violated university rules, created a hostile environment for Jewish students. The encampments blocked Jewish students from accessing classes, buildings, and dormitories; caused significant destruction of university property that is shared by all students; and created an environment of intimidation and fear. The University repeatedly disregarded its internal policies procedures (discussed more fully below in Part IV, Section 4) in allowing the encampments to remain, which resulted in the University’s inability to secure the Morningside campus to allow the 2024 Commencement Ceremony to proceed, and blocked student use of the campus for twenty days.

Finally, it is no defense that at least some of these deprivations affected non-Jewish students—e.g., that commencement was cancelled for the entire Columbia University graduating class of 2024, or that other students were likewise unable to freely walk across the campus. It is enough that Jewish students “suffered a hostile [] environment because of [their protected characteristic], not that all of the offensive conduct was *specifically* aimed at [them].” *Patane v. Clark*, 508 F.3d 106, 114-15 (2d Cir. 2007).

2. Columbia University had actual knowledge of the discrimination and harassment Jewish students experienced on its campus from October 7, 2023, through the present.

It is indisputable that Columbia University had “actual knowledge” for Title VI liability. See *Zeno*, 702 F.3d at 665. As early as October 11, 2023, shortly after the October 7 attacks, Columbia University limited access to its Morningside campus in anticipation of planned protests.¹¹⁰ The university was sued by multiple student organizations for failing to protect Jewish students from discrimination and harassment.¹¹¹ On or about December 13, 2023, Columbia University formed an Antisemitism Task Force.¹¹² The university has been subjected to multiple Congressional inquiries and investigations beginning in early 2024.¹¹³ Columbia University has had to call in the NYPD on numerous occasions to address student protestors. The University has had to revise its policies and procedures several times in response to protests. And Columbia University created the OIE, which has received student harassment complaints since the summer of 2024. These facts, and others, make clear that Columbia University had “actual knowledge” of the discrimination and harassment against its Jewish students for the relevant time period.

3. Columbia University exercised substantial control over the harassment and discrimination that Jewish students experienced on its campus from October 7, 2023, through the present.

Liability for deliberate indifference to known acts of peer harassment arises for third party institutions such as universities when the university “exercises substantial control over both the harasser and the context in which the known harassment occurs.” *Davis Next Friend LaShonda D. Monroe Cnty. Bd. of Educ.*, 526 U.S. 629, 645 (1999). A school exercises substantial control over the circumstances of the harassment when it occurs “during school hours and on school grounds.” *Id.* at 646. Similarly, a school authority to take remedial action lies in its longstanding disciplinary oversight over its students. See, e.g., *New Jersey v. T.L.O.*, 469 U.S. 325, 342 n.9, (1985); *Tinker v. Des Moines Indep. Cmty. Sch. Dist.*, 393 U.S. 503, 507 (1969).

Here, Columbia University exercises substantial control over both students who protested and vandalized university property and the circumstances in which the harassment occurred—the protests occurred on school property and were committed by Columbia students. As an initial matter, Columbia University controls the physical property of its campus, including locations such as Butler Library, the Social Work Building, Jerome L. Greene Hall, Hamilton Hall, and the Law School where unsanctioned protests and vandalism, such as the drawing of swastikas, occurred. While parts

of campus are open to the public, Columbia University has implemented heightened security protocols on its Morningside campus since October 2023. Further, it was within Columbia University's authority to physically remove protesters from its property by summoning the NYPD to disband the protests in 2024.

Columbia University also prescribes the conduct of its students and faculty through the Center for Student Success and Intervention's (CSSI's) Standards and Discipline, which incorporate by reference the prohibitions on discrimination and discriminatory harassment, including on the basis of race, color, religion, and national origin, that are included in the Equal Opportunity and Affirmative Action Policies & Procedures. In September 2024, the provisions of the Standards & Discipline concerning discrimination and discriminatory harassment were replaced by the Anti-Discrimination and Discriminatory Harassment Policy and Procedures for Students. Violence, physical and verbal assault, and harassment are all prohibited by Columbia University's policies.

In addition, Columbia University had various restrictions in place for student protests, including Rules of University Conduct restrictions on demonstrations not being allowed to disrupt a university function or render its continuation impossible. Recognizing the need for greater substantial control of student protest on campus, Columbia University made additions to its Event Policy webpage emphasizing the power to regulate the time, place, and manner of certain forms of public expression and noted that Columbia University possessed "sole discretion" to determine sanctions on student organizations and their members.

In February 2024, the University issued an "Interim University Policy for Safe Demonstrations" which clearly defined appropriate place and timing for demonstrations and made it clear that the policy applied to all types of demonstrations, both individuals as well as groups, and provided consequences for violations by groups and individuals. In September 2024, the University announced revised guidelines on the Rules of University Conduct, which detailed restrictions on demonstrations as well as updates to the University's disciplinary processes.

Throughout 2024-2025, Columbia University repeatedly demonstrated its control over protestors, including in April 2024 when it authorized the NYPD to clear the encampment on campus, allowing over 100 students to be arrested, and by restricting access to on-campus residents and essential personnel.

4. Columbia University acted with deliberate indifference because its response to the discrimination and harassment Jewish students experienced from October 7, 2023, through the present was clearly unreasonable in light of known circumstances.

Under the deliberate indifference standard, an institution may only be held liable for student-on-student harassment if its response to such harassment was "clearly unreasonable in light of the known circumstances, when remedial action only follows after a lengthy and unjustified delay, or if it offers no response at all." *Gartenburg*, 2025 WL 401109, *12 (internal citations omitted). In other words, Columbia University only violates Title VI if acted with deliberate indifference toward the hostile environment created by its students.

As explained in Part IV, Section 1, HHS OCR and ED OCR determined that Jewish students have experienced severe and pervasive harassment on Columbia University's campus since the October 7, 2023, attacks on Israel. Jewish students reported feeling targeted and unsafe in the days following October 7, 2023.

Yet Columbia University failed to meaningfully protect Jewish students in at least three ways. *First*, even when students reported discrimination, their concerns were often dismissed, downplayed or not addressed, resulting in continuous changing of policies and procedures, but the University made no meaningful changes in implementation. *Second*, Columbia University's actions with regard to preventing vandalism, including the continuous defacing of campus property with swastikas, were clearly unreasonable under the circumstances. *Third*, despite months of protests and demonstrations, Columbia University failed to adequately publicize and enforce time, place and manner restrictions on protests to ensure that Jewish students were able to attend classes, Hillel, dining halls, and other campus services without harassment or fear of bodily harm. Taken together, these actions and failures to act demonstrate Columbia's deliberate indifference. We address each in turn below.

A. Failure to Establish Effective Reporting and Remediation

First, we find that Columbia University acted with deliberate indifference in failing to establish effective reporting and remediation mechanisms for antisemitism. The University has revised student conduct policies that prohibit discriminatory harassment on the basis of race, color, national origin, and religion. These policies, as administered through the CSSI, and later through the OIE, set forth procedures for investigating and addressing reports of bias, including provisions for interim measures, support services, informal resolutions, and formal disciplinary proceedings. Columbia's Standards & Discipline and the Equal Opportunity and Affirmative Action Policy (EOAA Policy), which were in effect throughout 2023 and into mid-2024, were replaced in September 2024 and January 2025, respectively, by the Anti-Discrimination and Discriminatory Harassment Policies for Students, Faculty, and Staff. These updated policies emphasized Columbia University's commitment to maintaining a discrimination-free academic environment and centralized the University's response process under the OIE.

We find that Columbia University failed to properly implement or abide by its own policies and procedures. For example, Columbia University's Standards and Discipline, in effect through September 2024, specifically prohibited violations of the University's Non-discrimination Policy:

No student should engage in behavior that is inconsistent with the Columbia University Non-Discrimination Statement and Policy. Specifically, Discriminatory Harassment, in violation of the Non-Discrimination Statement and Policy, is defined as "subjecting an individual to unwelcome conduct, whether verbal or physical, that *creates an intimidating, hostile, or abusive working, learning or campus living environment; that alters the conditions of employment or education; or unreasonably interferes with an individual's work or academic performance on the basis of the individual's membership in a protected class is harassment.* [emphasis added]. Harassment may include but is not limited to: verbal abuse; epithets or slurs; negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; insulting or obscene comments or gestures; and the display or circulation of written or graphic material (including in hard copy, by e-mail or text) that denigrates or shows hostility or aversion toward an individual or group members of a protected class. Calls, texts, e-mails, and social media usage by students can contribute to a hostile work, learning, or living environment, even if they occur away from the University premises. The University will determine whether the conduct was humiliating, abusive, or threatening based on both subjective and objective factors, based on the totality of the circumstances surrounding an alleged incident or course of conduct, including, the frequency, nature, and severity of the conduct. The University will determine whether that conduct created a hostile environment by examining whether a reasonable person would find the environment hostile or abusive.¹¹⁴

Yet Columbia University repeatedly failed to enforce its own policies in a timely or consistent manner when responding to Jewish students' complaints. Students described reporting threats, vandalism, verbal harassment, physical intimidation, and exclusion from campus spaces. In many cases, Columbia University failed to investigate, minimized the concerns, or diverted complainants to counseling services rather than initiating appropriate investigatory or disciplinary action. Notably, the OIE was created in the summer of 2024, at least in part, due to the fact that the CSSI could not handle the volume of discrimination complaints it was receiving, which had previously been the office at Columbia University charged with handling discrimination complaints from students. Indeed, in multiple interviews with Columbia University faculty and administrators, staff demonstrated little to no familiarity with the University's different offices for reporting, let alone the mechanisms and procedures for doing so.

This is confirmed by the University's own Antisemitism Task Force, which documented in its reports that students' complaints were often dismissed, delayed, or ignored by administrators and that Jewish students were frequently made to feel that their concerns were invalid or signs of a personal issue rather than systemic discrimination.¹¹⁵ In one case, a student was told that "there is not an antisemitism problem, there is an anti-civility problem," while others were encouraged to leave campus if they felt unsafe. In another example, a student reporting antisemitic behavior was referred to bias reporting procedures, which at that time, did not include antisemitism as grounds for making a report. The Taskforce documented in August 2024, 10 months after the initial protests, that the university lacked effective reporting mechanisms for discrimination.¹¹⁶

In September 2024, eleven months after protests began, Columbia University adopted the Anti-Discrimination and Discriminatory Harassment Policies for Students. These policies addressed the balance between free speech and harassment, acknowledging the importance of place and duration in determining whether speech or conduct is harassment. This acknowledgement is significant as many protests or demonstrations had occurred in classrooms, educational buildings, and at or near residential and dining facilities, depriving students of Columbia University's educational benefits and opportunities. Yet despite the adoption of new policies in response to almost a year of recurring harassment of Jewish students, HHS OCR and ED OCR found harassment continued throughout 2024 and 2025. Documents reviewed indicate that OIE applied the policies to reports of antisemitism it received related to the October 7 and 8, 2024 CUAD Instagram posts; the October 7, 2024 protest on the South Lawn; the November 9 and 10, 2024 Hind's House exhibit; and the November 21, 2024 protest outside the Kraft Center. The documentation further indicates that OIE conducted investigations into the impacts of these events and spoke with at least some students about supportive resources. However, the documentation we reviewed does not indicate the outcomes of OIE's investigations, including whether the OIE made a determination of the existence of a hostile environment for Jewish students writ large, or took additional steps to address any hostile environment. Further, as late as February 3, 2025, nearly 200 faculty signed a letter urging action by Interim President Armstrong to promote the safety of Jewish students, including asking her to "reinstate and enforce former time-place-manner rules," citing "the ongoing failure of the University Senate and its leadership to support the Jewish community at Columbia."

Columbia University's continued failure to comply with, implement, and enforce its own policies and procedures, constituted deliberate indifference to the hostile environment Jewish students were experiencing on their campus.

B. Failure to Enforce Prohibition on Discriminatory Harassment through Vandalism

Second, we find that Columbia University acted with deliberate indifference towards discriminatory harassment against Jewish students through campus vandalism. For example, Columbia University's cleaning staff reported that "[i]n or around November 2023, individuals began to regularly leave obscene and racially charged graffiti, including graffiti of swastikas, on the blackboards in classrooms in Hamilton Hall. [The employee] saw swastikas on the chalkboards more times than he can recall. . . . But no matter how many times [he] removed the swastikas, individuals kept replacing them with more." Despite the employee's report, there is no evidence that Columbia University investigated the vandalism. The employee who reported swastikas was never interviewed by campus security, nor was he advised of any follow-up to his complaints. Rather, Columbia University instructed the employee and his colleagues to erase them. The employee stated, "Night after night, [he] was confronted with swastikas and obscenities in the classrooms he cleaned." These allegations were corroborated by a second complaint we reviewed from another Columbia University employee.

By directing staff to clean repeated chalking of hate symbols and failing to investigate who was violating the university rules of conduct, Columbia University acted with deliberate indifference by allowing “the display or circulation of written or graphic material (including in hard copy, by e-mail or text) that denigrates or shows hostility or aversion toward an individual or group members of a protected class.” A reasonable observer would readily conclude that one swastika in the classroom, let alone a recurrence of swastikas, creates a hostile environment for Jewish students. Yet, Columbia University did not attempt to enforce its own prohibitions by investigating who was responsible (despite having the technology and ability to do so), let alone holding those individuals responsible for their actions. Without enforcement, Columbia University failed to deter students from repeatedly drawing hate images universally recognized as antisemitic in the learning environment and acted with deliberate indifference.

C. Failure to Control Protests

Third, Columbia University acted with deliberate indifference in failing to control harassment and discrimination against Jewish students during protests on its campus from October 7, 2023 through the present. As an initial matter, Columbia University failed to enforce its own restrictions on student protest activity—particularly those governing the time, place, and manner of demonstrations. As early as October 2023, Columbia University began updating its event policies to reflect an awareness of the need for greater control over campus demonstrations. This included adding language to the University Event Policy and Student Group Event Policy clarifying the university’s authority to regulate and sanction protests and protestors. In February 2024, Columbia University adopted an Interim University Policy for Safe Demonstrations, which established designated “Demonstration Areas,” restricted protest hours, required advance approval for events, and stated that violations could result in sanctions for both individuals and groups. In September 2024, Columbia University again revised its Rules of University Conduct and disciplinary procedures in an effort to enhance enforcement mechanisms.

Despite these reforms, Columbia University failed to consistently or meaningfully enforce the time, place, and manner restrictions throughout the 2023–2025 academic years. Unauthorized protests—including those held inside academic buildings, residence halls, libraries, and during official university events—repeatedly disrupted classes, forced building evacuations, and created what many Jewish students described as an environment of fear and exclusion. Protestors set up encampments, staged walkouts, blocked access to buildings, vandalized property, and engaged in speech that glorified violence against Jews or Zionists. For example, in November 2023, students blocked the steps of Low Library, and students were unable to use the main entrance without having to walk through a “hall of shame.” Rather than order the protesters to disperse, administrators suggested that Jewish students enter the library through a side door. Low Library was not a recognized “Demonstration Area” by the University, and yet Columbia University failed to enforce its time place and manner restrictions, instead placing the onus on Jewish students to avoid the unsanctioned protest.

Indeed, Columbia’s Task Force on Antisemitism concluded in March 2024 that the University had “generally not tried to stop violations as they have occurred” and instead “focused on imposing discipline after the fact.” The Task Force’s report found that “[a]cross Columbia University, there also have been repeated violations of the rules on protests.... Protesters have disrupted classes and events, taken over spaces in academic buildings, held unauthorized demonstrations, and used ugly language to berate individuals who were filming these protests or just walking by. There also have been reports of physical harm to students, including Columbia affiliates who were protesting against Hamas and Columbia affiliates who were protesting against Israel.”¹¹⁷

Even when Columbia University *did* take action—such as authorizing the NYPD to clear the South Lawn encampment in April 2024 and suspending certain protestors—these responses were often delayed, reactive, and inconsistently applied. The University’s failure to act was particularly pronounced during the April 2024 encampments and the incident at Hamilton Hall. As early as April 18, 2024, President Shafik informed students that she was calling in the NYPD to clear the encampment because “[t]he individuals who established the encampment violated a long list of rules and policies. Through direct conversations and in writing, the university provided multiple notices of these violations, including a written warning at 7:15 p.m. on Wednesday notifying students who remained in the encampment as of 9:00 p.m. that they would be face suspension pending investigation.” But after pressure on the administration from the Faculty and Staff for Justice in Palestine at Columbia University on April 19, 2024—who called for, *inter alia*, a halt to all disciplinary proceedings against students, lifting of suspensions, and removal of the NYPD from campus—student demonstrators re-erected tents at the “Gaza Solidarity Encampment” in the South Lawn on April 21, 2024.

The next day on April 22, 2024, instead of re-deploying the NYPD to clear the *same* encampments that President Shafik had declared violated University policy just *three* days earlier, she instead announced a same-day shift to virtual classes as a means to “deescalate the rancor” and “give us all a chance to consider next steps.” And after a new midnight deadline came and went on April 23, 2024 to reach an agreement amid ongoing negotiations with student organizers involved in the “Gaza Solidarity Encampment,” Columbia University agreed to allow both the demonstrators and the encampment to remain in place. Indeed, on April 26, 2024, President Shafik and the administration announced that the University did not plan to call the NYPD back to campus.¹¹⁸

On April 29, 2024, President Shafik again recognized the hostile environment created by the encampments: “The encampment has created an unwelcoming environment for many of our Jewish students and faculty. External actors have contributed to creating a hostile environment in violation of Title VI, especially around our gates, that is unsafe for everyone—including our neighbors. With classes now concluding, it represents a noisy distraction for our students studying for exams and for everyone trying to complete the academic year. . . . We also do not want to deprive thousands of students and their families and friends of a graduation celebration . . . For all of the reasons above, we urge those in the encampment to voluntarily disperse.”¹¹⁹ Throughout this time, Jewish leaders repeatedly called on the University to enforce its rules of conduct.¹²⁰

Yet, it was a full *seven* days before Columbia University ordered students to disband or face suspension, and in fact *did* “deprive thousands of students and their families and friends of a graduation ceremony.”¹²¹ The cancellation of Commencement on May 6, 2024 is a stark culmination of Columbia University’s failure to respond in a timely and reasonable manner to the sustained, severe, and pervasive harassment experienced by Jewish students since October 2023, and especially highlighted in the twenty days leading up to and including the cancellation of its May 15, 2024 Commencement Ceremony.

Moreover, some of the students who occupied Hamilton Hall—which involved serious allegations of vandalism, violations of University policy, and harm to Columbia University employees—were not suspended until March 13, 2025, almost a year later,¹²² notwithstanding the fact that such disciplinary procedures before the University Judicial Board—under Columbia University’s own policies—are supposed to take only two months.¹²³ According to an FAQ issued by Columbia University to explain the delay, the University noted that it “began disciplinary processes immediately following these events [at Hamilton Hall]. In the summer of 2024, the University began transferring these cases to the Rules of University Conduct (“Rules”) process from the Dean’s Discipline process and they are currently being adjudicated under the Rules by the University Judicial Board (“UJB”) After being transferred from Dean’s Discipline to the Rules process, the cases were submitted to the UJB in August and September 2024. Certain procedural inquiries were raised and addressed through the Senate Rules Committee and the Rules Administrator’s Office over the fall. Soon thereafter, hearings began the week of January 6.”¹²⁴ But even assuming that the three-month delay from when the Hamilton Hall incident occurred was warranted due to the cases being transferred to the University Judicial Board in August and September 2024 (which it was not), the University fails to explain why it took another four months for hearings to even begin.

Finally, as we stated earlier, certain forms of masking at protests, when used to hide the identities of protestors made students fearful on campus contributing to a hostile environment. In addition, permitting this type of masking made it harder to enforce nondiscrimination laws and the University rules of behavior.¹²⁵ However, despite these concerns being expressed by Jewish students and others to the school, Columbia University has continued to act with deliberate indifference in addressing the issue. On March 21, 2025 letter, Columbia University agreed to address masking: “Public safety has determined that face masks or face coverings are not allowed for the purpose of concealing one’s identity in the commission of violations of University policies or state, municipal, or federal laws. We have had important instances in the recent past where individuals unaffiliated with the University have caused significant disruptions on our campus.”¹²⁶ But in a March 26, 2025 meeting with faculty, Interim President Armstrong assured them that “the school had made ‘no changes’ to rules surrounding the sorts of masked protests that plagued the university last year.”¹²⁷ This was explained in an interview HHS OCR conducted with a Columbia University faculty member, who stated, “[A]nother example like the new mask guidance that was issued, . . . turns out if your face is cold, you know, you’re allowed to wear a mask. And the university delegates who are enforcing the mask rules are not allowed to ask you why . . . You know, basically nobody has to say why they’re wearing a mask. . . . while the rule prohibits technically wearing a mask for the purpose of evading identification for rule violations, how would you ever test that purpose? And so, anyone who’s wearing a mask now can just say: ‘I’m wearing it because my face is cold.’” The University was clearly aware that the mask policy as applied made it difficult to identify and discipline students whose behavior violated university policies. Without effective identification, both the administration and students knew that consequences for violating policy were unlikely. In light of the known circumstances, we find that Columbia University’s actions in protecting Jewish students from masked harassers was clearly an unreasonable response to ongoing harassment.

In sum, in evaluating Columbia University’s lack of effective enforcement of its own policies and failure to establish effective procedures for protecting Jewish students, HHS OCR and ED OCR find that Columbia University acted with deliberate indifference.

V. Procedure for Effecting Compliance

HHS and ED regulations permit referral of matters to the Department of Justice if compliance under Title VI cannot be obtained voluntarily.¹²⁸ 45 C.F.R. § 80.8(a); 34 C.F.R. § 100.8(a). The regulations provide:

If there appears to be a failure or threatened failure to comply with this regulation, and if the noncompliance or threatened noncompliance cannot be corrected by informal means, compliance with this part may be effected by . . . any other means authorized by law. Such other means may include, but are not limited to . . . a reference to the Department of Justice with a recommendation that appropriate proceedings be brought to enforce any rights of the United States under any law of the United States (including other titles of the Act), or any assurance or other contractual undertaking . . .

Further, “[n]o action to effect compliance by any other means authorized by law shall be taken until:

- (1) the responsible Department official has determined that compliance cannot be secured by voluntary means,
- (2) the recipient or other person has been notified of its failure to comply and of the action to be taken to effect compliance, and
- (3) the expiration of at least 10 days from the mailing of such notice to the recipient or other person. During this period of at least 10 days additional efforts shall be made to persuade the recipient or other person to comply with the regulation and to take such corrective action as may be appropriate.

45 C.F.R. § 80.8(d); 34 C.F.R. § 100.8(d). This Notice of Violation constitutes official notice of Columbia University’s failure to comply with Title VI, as required by subsection (2). To secure compliance by voluntary means, the federal government has engaged in extended discussions with Columbia University regarding the hostile environment on its campus for Jewish students since October 7, 2023, and its failure to appropriately respond to that

hostile environment. Both HHS OCR and ED OCR will make additional efforts to persuade the University to take appropriate corrective action. However, given the length of time that has transpired since October 7, 2023 through the present, and the series of events that have demonstrated to us that the University has acted—and continues to act—with deliberate indifference, we will refer this matter to the Department of Justice as soon as allowed under the regulations after the mailing of this Notice absent voluntary compliance.

Sincerely,

/s/

Anthony F. Archeval Acting Director
HHS, Office for Civil Rights

/s/

Craig W. Trainor
Acting Assistant Secretary ED, Office for Civil Rights

Endnotes

¹ 42 U.S.C. § 2000d, and its implementing regulations at 45 C.F.R. Part 80 (HHS) and 34 C.F.R. Part 100 (ED).

² 45 C.F.R. § 80.3(a) and 34 C.F.R. § 100.3(a).

³ 45 C.F.R. 80.3(b) and 34 C.F.R. § 100.3(b).

⁴ 42 U.S.C. § 2000d-1, 45 C.F.R. § 80.2 and 34 C.F.R. § 100.2.

⁵ See TAGGS, Recipient Information for The Trustees of Columbia University in the City of New York (last visited Mar. 6, 2025), https://tags.hhs.gov/Detail/RecipDetail?arg_EntityId=srEZxmX26zhzn%2BUWKVwkw%3D%3D.

⁶ See NIH RePORT, Funding for Columbia University Health Sciences (last visited Mar. 6, 2025) (FY 2023: <https://report.nih.gov/award/index.cfm?ot=DH,27,47,4,52,64,41,MS,20,16,6,13,10,49,53,86,OTHDH&fy=2023&sta te=NY&ic=&fm=&orgid=1833205&distr=&rfa=&om=n&pid=#tab2>; FY 2024: <https://report.nih.gov/award/index.cfm?ot=DH,27,47,4,52,64,41,MS,20,16,6,13,10,49,53,86,OTHDH&fy=2024&sta te=NY&ic=&fm=&orgid=1833205&distr=&rfa=&om=n&pid=#tab2>; FY 2025: <https://report.nih.gov/award/index.cfm?ot=DH,27,47,4,52,64,41,MS,20,16,6,13,10,49,53,86,OTHDH&fy=2025&sta te=NY&ic=&fm=&orgid=1833205&distr=&rfa=&om=n&pid=#tab2>.)

⁷ See, e.g., - Federal Awards | Advanced Search | USAspending; Title IV Program Volume Reports | Federal Student Aid. <https://studentaid.gov/data-center/student/title-iv>.

⁸ Columbia University, Fall Headcount Enrollment by School, 2013–2024. [PDF] https://opir.columbia.edu/sites/default/files/content/statistical%20abstract/opir_enrollment_history.pdf

⁹ General Studies student allegedly assaulted in front of Butler Library, suspect arrested and charged, NYPD says <https://www.columbiaspectator.com/news/2023/10/12/general-studies-student-allegedly-assaulted-in-front-of-butler-library-suspect-arrested-and-charged-nypd-says/>

¹⁰ Columbia restricts access to Morningside campus ahead of planned protests <https://www.columbiaspectator.com/news/2023/10/11/columbia-restricts-access-to-morningside-campus-ahead-of-planned-protests/>

¹¹ Swastika found drawn in International Affairs Building restroom <https://www.columbiaspectator.com/news/2023/10/30/swastika-found-drawn-in-international-affairs-building-restroom/>

¹² Announcing Task Force on Antisemitism | Office of the President <https://president.columbia.edu/news/announcing-task-force-antisemitism>

¹³ ‘I am a target’: Dozens of Jewish students report feeling unsafe on campus <https://www.columbiaspectator.com/news/2023/11/02/i-am-a-target-dozens-of-jewish-students-report-feeling-unsafe-on-campus/>

¹⁴ Announcing a SIPA Anti-Hate Task Force | Columbia SIPA <https://www.sipa.columbia.edu/news/announcing-sipa-antihate-task-force>

¹⁵ Statement From Gerald Rosberg, Chair of the Special Committee on Campus Safety | Columbia News Columbia suspends SJP and JVP following ‘unauthorized’ Thursday walkout <https://news.columbia.edu/news/statement-gerald-rosberg-chair-special-committee-campus-safety>

¹⁶ *Students Against Antisemitism, Inc., et. al. v. Trustees of Columbia University and Barnard College*, 24-cv- 013060VSB-SN (S.D.N.Y. 2024).

¹⁷ [Bwog.com/2023/12/columbia-university-apartheid-divest-organizes-protests-on-low-steps-and-college-walk/](https://www.bwog.com/2023/12/columbia-university-apartheid-divest-organizes-protests-on-low-steps-and-college-walk/)

¹⁸ *Id.*

¹⁹ *Id.*

²⁰ *Students Against Antisemitism, Inc., et. al. v. Trustees of Columbia University and Barnard College*, 24-cv- 013060VSB-SN (S.D.N.Y. 2024).

²¹ <https://www.columbiaspectator.com/news/2023/12/08/school-of-social-work-students-hold-palestinian-counteroffensive-teach-in-despite-cancellation-by-administration/>

²² *Id.*

²³ Columbia Task Force on Antisemitism, *Columbia University's Rules on Demonstrations* (Report #1), p. 21.

²⁴ University Announces Members of the Task Force on Antisemitism | Columbia News <<https://news.columbia.edu/news/university-announces-members-task-force-antisemitism>>

²⁵ <https://www.columbiajewishalumni.org/announcements/timeline-of-recent-events-at-columbia>
<<https://www.columbiajewishalumni.org/announcements/timeline-of-recent-events-at-columbia>>

²⁶ Student Governing Board derecognizes LionLez in slim majority vote following widespread controversy
<<https://www.columbiaspectator.com/news/2024/01/31/student-governing-board-derecognizes-lionlez-in-slim-majority-vote-following-widespread-controversy/>>

²⁷ <https://www.thefire.org/research-learn/fire-letter-columbia-law-student-senate-february-2-2024> <<https://www.thefire.org/research-learn/fire-letter-columbia-law-student-senate-february-2-2024>>

²⁸ 2-12-24_foxx_letter_to_columbia_university.pdf [PDF] <https://edworkforce.house.gov/uploadedfiles/2-12-24_foxx_letter_to_columbia_university.pdf>

²⁹ Columbia establishes 'Demonstration Areas' and times, alters disciplinary procedure for students in violation of
<<https://www.columbiaspectator.com/news/2024/02/19/columbia-establishes-demonstration-areas-and-times-alters-disciplinary-procedure-for-students-in-violation-of-new-event-policy/>> new event policy <<https://www.columbiaspectator.com/news/2024/02/19/columbia-establishes-demonstration-areas-and-times-alters-disciplinary-procedure-for-students-in-violation-of-new-event-policy/>>

³⁰ https://edworkforce.house.gov/uploadedfiles/yadegar_updated_written_statement.pdf [PDF]
<https://edworkforce.house.gov/uploadedfiles/yadegar_updated_written_statement.pdf>

³¹ *Id.* at 2-3.

³² *Id.*

³³ 'Where does a Jew belong?': Over 20 pro-Israel Jewish students report feeling ostracized on campus.
<<https://www.columbiaspectator.com/news/2024/04/01/where-does-a-jew-belong-over-20-pro-israel-jewish-students-report-feeling-ostracized-on-campus/>>

³⁴ Timeline: The 'Gaza Solidarity Encampment' <<https://www.columbiaspectator.com/news/2024/05/02/timeline-the-gaza-solidarity-encampment/>>

³⁵ *Id.*

³⁶ *Id.*

³⁷ COLUMBIA UNIVERSITY APARTHEID DIVEST (CUAD) | BREAKING THE TENTS ARE BACK UP. COLUMBIA ADMIN IS FULLY AWARE. WE WILL NOT BE MOVED UNTIL COLUMBIA DIVESTS!!! | Instagram

³⁸ Holloway, Gillman announce enhanced security measures and personnel around campus as protests continue
<<https://www.columbiaspectator.com/news/2024/04/21/holloway-gillman-announce-enhanced-security-measures-and-personnel-around-campus-as-protests-continue/>>

³⁹ *Id.*

⁴⁰ 'We need a reset': Shafik breaks silence, announces same-day shift to virtual classes <<https://www.columbiaspectator.com/news/2024/04/22/we-need-a-reset-shafik-breaks-silence-announces-same-day-shift-to-virtual-classes/>>

⁴¹ Over 100 faculty members protest in 'Rally to Support our Students and Reclaim our University'
<<https://www.columbiaspectator.com/news/2024/04/23/over-100-faculty-members-protest-in-rally-to-support-our-students-and-reclaim-our-university/>>

⁴² Shafik announces midnight deadline for ongoing encampment negotiations before
<<https://www.columbiaspectator.com/news/2024/04/23/shafik-announces-midnight-deadline-for-ongoing-encampment-negotiations-before-consideration-of-alternative-options/>>

⁴³ *Students Against Antisemitism, Inc., et. al. v. Trustees of Columbia University and Barnard College*, 24-cv- 013060VSB-SN (S.D.N.Y. 2024).

- ⁴⁴ Shafik announces midnight deadline for ongoing encampment negotiations before midnight-deadline-for-ongoing-encampment-negotiations-before-consideration-of-alternative-options/> <<https://www.columbiaspectator.com/news/2024/04/23/shafik-announces-midnight-deadline-for-ongoing-encampment-negotiations-before-consideration-of-alternative-options/>>
- ⁴⁵ ‘Students deserve better’: CEOs of American Jewish Committee and Hillel hold press deserve-better-ceos-of-american-jewish-committee-and-hillel-hold-press-conference-call-for-stricter-enforcement-of-disciplinary-codes/> <<https://www.columbiaspectator.com/news/2024/04/29/students-deserve-better-ceos-of-american-jewish-committee-and-hillel-hold-press-conference-call-for-stricter-enforcement-of-disciplinary-codes/>>
- ⁴⁶ (17) Daily Wire on X: “Meet Khymani James, a student leader of Columbia University’s anti-Israel Gaza Solidarity Encampment” <<https://x.com/realdailywire/status/1783638100700172365>> <<https://x.com/realdailywire/status/1783638100700172365>>
- ⁴⁷ Statement from Columbia University President Minouche Shafik | Office of the President <<https://president.columbia.edu/news/statement-columbia-university-president-minouche-shafik-4-29>>
- ⁴⁸ Columbia urges encampment participants to leave, warns of interim suspension as handing-out-notices-urging-encampment-participants-to-leave-warns-of-interim-suspension/> <<https://www.columbiaspectator.com/news/2024/04/29/columbia-begins-handing-out-notices-urging-encampment-participants-to-leave-warns-of-interim-suspension/>>
- ⁴⁹ Hundreds picket around South Lawn as suspension deadline expires <<https://www.columbiaspectator.com/news/2024/04/29/hundreds-picket-around-south-lawn-as-suspension-deadline-expires/>>
- ⁵⁰ Columbia begins to suspend students in ‘Gaza Solidarity Encampment,’ University to-suspend-students-in-gaza-solidarity-encampment-university-spokesperson-says/> <<https://www.columbiaspectator.com/news/2024/04/29/columbia-begins-to-suspend-students-in-gaza-solidarity-encampment-university-spokesperson-says/>>
- ⁵¹ Dozens occupy Hamilton Hall as pro-Palestinian protests spread across campus hamilton-hall-as-pro-palestinian-protests-spread-across-campus/> <<https://www.columbiaspectator.com/news/2024/04/30/dozens-occupy-hamilton-hall-as-pro-palestinian-protests-spread-across-campus/>>
- ⁵² Columbia locks down Morningside campus following Hamilton occupation, Barnard down-morningside-campus-following-hamilton-occupation-barnard-restricted-to-affiliates/> <<https://www.columbiaspectator.com/news/2024/04/30/columbia-locks-down-morningside-campus-following-hamilton-occupation-barnard-restricted-to-affiliates/>>
- ⁵³ Columbia Commencement ceremonies canceled, school Class Days moved off campus commencement-ceremonies-canceled-school-class-days-moved-off-campus/> <<https://www.columbiaspectator.com/news/2024/05/06/columbia-commencement-ceremonies-canceled-school-class-days-moved-off-campus/>>
- ⁵⁴ We hear you <<https://www.columbiaspectator.com/opinion/2024/05/16/we-hear-you/>>
- ⁵⁵ Pro-Palestinian protesters repitch encampment on South Lawn during annual alumni reunion palestinian-protesters-repitch-encampment-on-south-lawn-during-annual-alumni-reunion/> <<https://www.columbiaspectator.com/news/2024/05/31/pro-palestinian-protesters-repitch-encampment-on-south-lawn-during-annual-alumni-reunion/>>
- ⁵⁶ Columbia reaches settlement in class action suit alleging hostile environment for Jewish students, establishes additional security measures <<https://www.columbiaspectator.com/news/2024/06/06/columbia-reaches-settlement-in-class-action-suit-alleging-hostile-environment-for-jewish-students-establishes-additional-security-measures/>>
- ⁵⁷ Greenberg addresses University Senate concerns over campus access restrictions at plenary <<https://www.columbiaspectator.com/news/2024/07/29/greenberg-addresses-university-senate-concerns-over-campus-access-restrictions-at-plenary/>>
- ⁵⁸ Columbia President Minouche Shafik resigns amid campus turmoil over war in Gaza from-presidency/> <<https://www.columbiaspectator.com/news/2024/08/14/shafik-resigns-from-presidency/>>
- ⁵⁹ Report #2 Columbia University Student Experiences Of Antisemitism And Recommendations For Promoting Shared Values And Inclusion Task Force On Antisemitism.
- ⁶⁰ *Id.* p. 25
- ⁶¹ *Id.* at 26.
- ⁶² *Id.* at 30.
- ⁶³ *Id.* at 32.
- ⁶⁴ *Id.* at 33.
- ⁶⁵ 2024 Anti-D & DH Policy & Procedures for Students.pdf [PDF] <<https://institutionalequity.columbia.edu/sites/default/files/content/documents/policies/2024%20anti-d%20%26%20dh%20policy%20%26%20procedures%20for%20students.pdf>>
- ⁶⁶ Updates For Our Community | Office of the President <<https://president.columbia.edu/content/updates-our-community>>
- ⁶⁷ 10.30.24_committee_on_education_and_the_workforce_republican_staff_report_antisemitism_on_college_campuses_exposed.pdf
- ⁶⁸ Public Safety launches pilot program to remove CUID restrictions on most Morningside campus buildings <<https://www.columbiaspectator.com/main/2024/11/15/public-safety-launches-pilot-program-to-remove-cuid-restrictions-on-most-morningside-campus-buildings/>>

- ⁶⁹ Pro-Palestinian protesters call to ‘sever all ties with Hillel’ outside Kraft Center <<https://www.columbiaspectator.com/news/2024/11/22/pro-palestinian-protesters-call-to-sever-all-ties-with-hillel-outside-kraft-center/>>
- ⁷⁰ Two Barnard students expelled for History of Modern Israel class disruption, CUAD says <<https://www.columbiaspectator.com/news/2025/02/23/two-barnard-students-expelled-for-history-of-modern-israel-class-disruption-cuad-says/>>
- ⁷¹ Update on University Actions Taken After Class Disruption | Office of Public Affairs <<https://communications.news.columbia.edu/news/update-university-actions-taken-after-class-disruption>>
- ⁷² Update on University Actions on Classroom Disruption | Office of Public Affairs <<https://communications.news.columbia.edu/news/update-university-actions-classroom-disruption>>
- ⁷³ Update on Morningside Campus Access | Office of the President <<https://president.columbia.edu/news/update-morningside-campus-access-1-24-25>>
- ⁷⁴ Nearly 200 faculty members sign letter urging Columbia to implement safety measures for Jewish students <<https://www.columbiaspectator.com/main/2025/02/12/nearly-200-faculty-members-sign-letter-urging-columbia-to-implement-safety-measures-for-jewish-students/>>
- ⁷⁵ 2.13.25_columbia_letter.pdf [PDF] <https://edworkforce.house.gov/uploadedfiles/2.13.25_columbia_letter.pdf>
- ⁷⁶ Advisory Committee on Institutional Voice to offer recommendations on institutional neutrality by end of academic year, Armstrong announces. <<https://www.columbiaspectator.com/news/2025/02/19/advisory-committee-on-institutional-voice-to-offer-recommendations-on-institutional-neutrality-by-end-of-academic-year-armstrong-announces/>>
- ⁷⁷ Office of Institutional Equity launches mandatory antidiscrimination training <<https://www.columbiaspectator.com/news/2025/02/16/office-of-institutional-equity-launches-mandatory-antidiscrimination-training/>>
- ⁷⁸ <https://apnews.com/article/columbia-university-protests-c148d1d01718a4482541a6df6cad8d74> <<https://apnews.com/article/columbia-university-protests-c148d1d01718a4482541a6df6cad8d74>>
- ⁷⁹ We recognize that a hostile environment alone does not create Title VI liability for Columbia University—it is the school’s deliberate indifference to such harassment that imposes such liability. We discuss the “deliberate indifference” element at length in Section IV, Part 4. In this part, we focus on providing an analysis of whether there was a hostile environment for Jewish students at Columbia University, though we will also identify inaction on Columbia University’s part, where appropriate, with the bulk of our analysis on “deliberate indifference” in Section IV, Part 4.
- ⁸⁰ ‘I am a target’: Dozens of Jewish students report feeling unsafe on campus <<https://www.columbiaspectator.com/news/2023/11/02/i-am-a-target-dozens-of-jewish-students-report-feeling-unsafe-on-campus/>>
- ⁸¹ Statement From Gerald Rosberg, Chair of the Special Committee on Campus Safety | Columbia News <<https://news.columbia.edu/news/statement-gerald-rosberg-chair-special-committee-campus-safety>> Columbia <<https://www.columbiaspectator.com/news/2023/11/10/columbia-suspends-sjp-and-jvp-following-unauthorized-thursday-walkout/>> suspends SJP and JVP following ‘unauthorized’ Thursday walkout <<https://www.columbiaspectator.com/news/2023/11/10/columbia-suspends-sjp-and-jvp-following-unauthorized-thursday-walkout/>>
- ⁸² Columbia Task Force on Antisemitism, *Columbia University’s Rules on Demonstrations* (March 4, 2024) (Report #1), pp. 2-3.
- ⁸³ Timeline: The ‘Gaza Solidarity Encampment’ <<https://www.columbiaspectator.com/news/2024/05/02/timeline-the-gaza-solidarity-encampment/>>
- ⁸⁴ *Id.*
- ⁸⁵ COLUMBIA UNIVERSITY APARTHEID DIVEST (CUAD) | BREAKING THE TENTS ARE BACK UP. COLUMBIA ADMIN IS FULLY AWARE. WE WILL NOT BE MOVED UNTIL COLUMBIA DIVESTS!!!!| Instagram
- ⁸⁶ Shafik announces midnight deadline for ongoing encampment negotiations before <<https://www.columbiaspectator.com/news/2024/04/23/shafik-announces-midnight-deadline-for-ongoing-encampment-negotiations-before-consideration-of-alternative-options/>>
- ⁸⁷ *Students Against Antisemitism, Inc., et. al. v. Trustees of Columbia University and Barnard College*, 24-cv- 013060VSB-SN (S.D.N.Y. 2024).
- ⁸⁸ Dozens occupy Hamilton Hall as pro-Palestinian protests spread across campus <<https://www.columbiaspectator.com/news/2024/04/30/dozens-occupy-hamilton-hall-as-pro-palestinian-protests-spread-across-campus/>>
- ⁸⁹ *Id.*
- ⁹⁰ Columbia Commencement ceremonies canceled, school Class Days moved off campus <<https://www.columbiaspectator.com/news/2024/05/06/columbia-commencement-ceremonies-canceled-school-class-days-moved-off-campus/>>
- ⁹¹ University Event Policy | University Policies <<https://universitypolicies.columbia.edu/content/university-event-policy>>
- ⁹² We hear you <<https://www.columbiaspectator.com/opinion/2024/05/16/we-hear-you/>>

- ⁹³ Pro-Palestinian protesters repitch encampment on South Lawn during annual alumni reunion <<https://www.columbiaspectator.com/news/2024/05/31/pro-palestinian-protesters-repitch-encampment-on-south-lawn-during-annual-alumni-reunion/>>
- ⁹⁴ Columbia Task Force on Antisemitism, *Columbia University Student Experiences Of Antisemitism And Recommendations For Promoting Shared Values And Inclusion Task Force On Antisemitism* (Report #2), at 32.
- ⁹⁵ *C.S. v. Trustees of Columbia University in the City of New York*, 24-cv-03232 (S.D.N.Y. April 24, 2024).
- ⁹⁶ Columbia reaches settlement in class action suit alleging hostile environment for Jewish students, establishes additional security measures <<https://www.columbiaspectator.com/news/2024/06/06/columbia-reaches-settlement-in-class-action-suit-alleging-hostile-environment-for-jewish-students-establishes-additional-security-measures/>>
- ⁹⁷ *Id.*
- ⁹⁸ Columbia Task Force on Antisemitism, Report #2: “Many students objected to face masking, though they interpreted masking in different ways. Some believed it was directly related to the University’s failure to identify what hate speech is. Others saw it as proof that the protesters knew they were violating rules and wanted to be insulated from discipline and other consequences.”
- ⁹⁹ Two Barnard students expelled for History of Modern Israel class disruption, CUAD says <<https://www.columbiaspectator.com/news/2025/02/23/two-barnard-students-expelled-for-history-of-modern-israel-class-disruption-cuad-says/>>
- ¹⁰⁰ Swastika found drawn in International Affairs Building restroom <<https://www.columbiaspectator.com/news/2023/10/30/swastika-found-drawn-in-international-affairs-building-restroom/>>
- ¹⁰¹ Columbia Univ., Standards and Discipline, p. 8.
- ¹⁰² Columbia Task Force on Antisemitism, Report #1, p. 21.
- ¹⁰³ https://edworkforce.house.gov/uploadedfiles/yadegar_updated_written_statement.pdf [PDF] <https://edworkforce.house.gov/uploadedfiles/yadegar_updated_written_statement.pdf>
- ¹⁰⁴ Columbia Task Force on Antisemitism, Report #1, p. 2.
- ¹⁰⁵ Columbia Task Force on Antisemitism, Report #2, p. 25
- ¹⁰⁶ [Bwog.com/2023/12/columbia-university-apartheid-divest-organizes-protests-on-low-steps-and-college-walk/](https://www.bwog.com/2023/12/columbia-university-apartheid-divest-organizes-protests-on-low-steps-and-college-walk/), *Students Against Antisemitism, Inc., et. al. v. Trustees of Columbia University and Barnard College*, 24-cv- 013060VSB-SN (S.D.N.Y. 2024).
- ¹⁰⁷ *Students Against Antisemitism, Inc., et. al. v. Trustees of Columbia University and Barnard College*, 24-cv- 013060VSB-SN (S.D.N.Y. 2024).
- ¹⁰⁸ Columbia Task Force on Antisemitism, Report #1 at 2-3.
- ¹⁰⁹ *Id.*
- ¹¹⁰ Columbia restricts access to Morningside campus ahead of planned protests <<https://www.columbiaspectator.com/news/2023/10/11/columbia-restricts-access-to-morningside-campus-ahead-of-planned-protests/>>
- ¹¹¹ *Students Against Antisemitism, Inc., et. al. v. Trustees of Columbia University and Barnard College*, 24-cv 013060VSB-SN (S.D.N.Y. 2024); *C.S. v. Trustees of Columbia University*, 24-cv-03232-AT-SN (S.D.N.Y. 2024).
- ¹¹² University Announces Members of the Task Force on Antisemitism | Columbia News <<https://news.columbia.edu/news/university-announces-members-task-force-antisemitism>>
- ¹¹³ See e.g., 2-12-24_foxx_letter_to_columbia_university.pdf [PDF] <https://edworkforce.house.gov/uploadedfiles/2-12-24_foxx_letter_to_columbia_university.pdf>
- ¹¹⁴ Columbia’s Standards and Discipline, p. 5
- ¹¹⁵ Columbia Task Force on Antisemitism Report #2
- ¹¹⁶ Columbia Task Force on Antisemitism Report #2
- ¹¹⁷ *Id.* at 2-3.
- ¹¹⁸ Shafik announces midnight deadline for ongoing encampment negotiations before <<https://www.columbiaspectator.com/news/2024/04/23/shafik-announces-midnight-deadline-for-ongoing-encampment-negotiations-before-consideration-of-alternative-options/>>
- ¹¹⁹ <https://president.columbia.edu/news/statement-columbia-university-president-minouche-shafik-4-29> <<https://president.columbia.edu/news/statement-columbia-university-president-minouche-shafik-4-29>>

¹²⁰ ‘Students deserve better’: CEOs of American Jewish Committee and Hillel hold press <https://www.columbiaspectator.com/news/2024/04/29/students-deserve-better-ceos-of-american-jewish-committee-and-hillel-hold-press-conference-call-for-stricter-enforcement-of-disciplinary-codes/>

¹²¹ Columbia urges encampment participants to leave, warns of interim suspension as <https://www.columbiaspectator.com/news/2024/04/29/columbia-begins-handing-out-notices-urging-encampment-participants-to-leave-warns-of-interim-suspension/>

¹²² <https://apnews.com/article/columbia-university-protests-c148d1d01718a4482541a6df6cad8d74> <https://apnews.com/article/columbia-university-protests-c148d1d01718a4482541a6df6cad8d74>

¹²³ <https://universitypolicies.columbia.edu/content/rules-university-conduct> <https://universitypolicies.columbia.edu/content/rules-university-conduct> (“The University will seek to resolve every report of misconduct within approximately two (2) months of an incident, not counting any appeal.”).

¹²⁴ <https://universitylife.columbia.edu/news/faqs-university-judicial-board-ujb-hearings-spring-2024-cases> <https://universitylife.columbia.edu/news/faqs-university-judicial-board-ujb-hearings-spring-2024-cases>

¹²⁵ Columbia Task Force on Antisemitism, Report #2: “Many students objected to face masking, though they interpreted masking in different ways. Some believed it was directly related to the University’s failure to identify what hate speech is. Others saw it as proof that the protesters knew they were violating rules and wanted to be insulated from discipline and other consequences.”

¹²⁶ chrome-extension://efaidnbmnnnibpajpcglclefindmkaj/https://president.columbia.edu/sites/default/files/content/03.21.2025%20Columbia%20-%20FINAL.pdf [PDF] <chrome-extension://efaidnbmnnnibpajpcglclefindmkaj/https://president.columbia.edu/sites/default/files/content/03.21.2025%20columbia%20-%20final.pdf>

¹²⁷ <https://freebeacon.com/campus/what-columbia-university-president-really-told-faculty-members/> <https://freebeacon.com/campus/what-columbia-university-president-really-told-faculty-members/>

¹²⁸ For administrative enforcement involving “suspending, terminating or refusing to grant or continue Federal financial assistance,” no such enforcement steps can be taken until (1) the responsible Department official has advised the recipient of its failure to comply and has determined that voluntary compliance cannot be secured, (2) there has been an express finding, after opportunity for hearing, of a failure to comply, and (3) the expiration of 30 days after the Secretary has notified Congress. 45 C.F.R. § 80.8(c); 34 C.F.R. § 100.8(c).

Content created by Office for Civil Rights (OCR)

Content last reviewed May 23, 2025